

STANDARD CHLORINE CHEMICAL CO., INC

1035 Belleville Turnpike
Kearny, NJ 07032-0602

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Margaret W. Kelly
VP/General Counsel

By FEDEX

Ed Als, Remedial Project Manager
Emergency and Remedial Response Division
U.S.E.P.A, Region 2
290 Broadway, 20th Fl
New York, New York 10007-1866

July 21, 2008

Re: Standard Chlorine Chemical Co., Inc. Superfund
Site (SCCC Site) CERCLA Section 104(e)
Information Request Letters dated April 3, 2008

Dear Mr. Als:

This letter, including the attached schedules and the documents referenced herein and in those schedules, collectively provides preliminary responses of both Standard Chlorine Chemical Co., Inc. ("SCCCC" or the "Company") and Standard Naphthalene Products Co., Inc. ("SNP") to the above-referenced information requests (collectively, the "Information Request") addressed to each of these companies. All responses set out in this letter have been prepared on behalf of SCCC and SNP by Margaret W. Kelly, Esq., in house counsel to SCCC, based on an ongoing search for and review of available documents.

Please be advised that the responses provided herein have been developed to the best of SCCC's ability. The resources of SCCC, both human and financial, are extremely constrained, while those of SNP are virtually non-existent. SCCC ceased all its ongoing chemical manufacturing business activities in late 1998. Since that time it has had only two employees, and its only activities have been those necessary to an orderly winding down of its affairs, primarily the resolution of environmental conditions and liabilities at the SCCC Site. With respect to the Company's extremely limited financial resources, I have already spoken with Ms. Raut to request information on "Ability to Pay Settlements." SNP has not conducted any business operations since 1981, and has no intangible assets. Its sole remaining asset for the past several decades has been the property it owns which forms part of the SCCC Site. This property currently has a negative worth, and is encumbered by unpaid tax liens. SNP has no resources at all to apply towards payment of response costs.

SDMS Document



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Information provided in this preliminary response:

These preliminary responses address only Questions 1-4 and Question 14 of the Information Request. Narrative responses to the remaining questions will be provided as soon as feasible. In the meantime, however, please find attached the following schedules of documents which contain relevant information and from which the responses to those questions will be developed, and which are provided at this time to assist you in familiarizing yourself with the history of the Site and the extensive environmental investigations that have been conducted to date.

- Attachment A1 –Schedule of Site Investigation and Remediation Documents, Mar 1983 to July 2003.
- Attachment A2 – Schedule of Site Investigation and Remediation Documents, Oct 2003 to June 2008
- Attachment B - Schedule of Industrial Site Recovery Act (ISRA Documents, Cloroben Chemical Corp (Cloroben), Block 287, Lot 50
- Attachment C – Schedule of Chromium Documents, Mar 1983 to Jul 2003
- Attachment D – Schedule of NJPDES Permit No NJ0001856 Documents
- Attachment E– Schedule of Edison/Emark Battery Corporation Blueprints and Drawings (Buildings and Equipment on Block 287, Lot 50).

PDF copies of many of the documents referenced in the schedules listed above have already been transmitted electronically to you and Ms. Raut, either by SCCC or other members of the PRG. The additional items listed below are being provided today:

- a CD dated May 16, 2005 and labeled “CD contains: Figures” contains 41 PDF files of the 2005 data maps referenced in Schedule A2; and
- a DVD labeled “Edison/Cooper Blueprints & Drawings” containing PDF copies of the documents listed in Attachment E.

The other scheduled documents will either be transmitted electronically (if the files are small enough) or provided on a DVD or CD in the near future.

PRELIMINARY RESPONSES OF SCCC AND SNP TO THE INFORMATION REQUEST:

- I. a) *State the correct name and mailing address of the Company.*

SCCC Response:

Standard Chlorine Chemical Co., Inc. (SCCC)
1035 Belleville Turnpike
Kearny, NJ 07032

SNP Response:

Standard Naphthalene Products Co., Inc. (SNP)
c/o Standard Chlorine Chemical Co., Inc. (SCCC)
1035 Belleville Turnpike
Kearny, NJ 07032

- b) *State the name and address of the president, chief executive officer or the chairman of the board, or other presiding officer of the Company.*

SCCC and SNP Response:

In December 1988 substantially all the business assets of SCCC's operating subsidiaries as well as those assets of SCCC assets related to its chemical manufacturing business were sold to an unrelated entity, Metachem Products, LLC. The Company's sole business activities since that time have been those limited administrative activities necessary to wind down its affairs in an orderly fashion. SCCC's sole officer holds the same position for SNP.

Margaret W. Kelly, Esq.
Vice President/General Counsel
Standard Chlorine Chemical Co., Inc.
1035 Belleville Turnpike
Kearny, NJ 07032

- c) *Identify the state of incorporation of Company and its agent for service of process in the state of incorporation and in New Jersey.*

Response for SCCC and SNP:

State of Incorporation: New Jersey
Agent for service of Process: Margaret W. Kelly

- d) *If the Company is a subsidiary or affiliate of another company, or has subsidiaries, or is a successor to another company, identify these related companies. For each related company, describe the relationship to the Company and indicate the date and*

manner in which each relationship was established.

Response for SCCC and SNP:

SCCC has two wholly-owned subsidiaries, Standard Naphthalene Products Co., Inc. (SNP), a New Jersey corporation, and Godel, Inc, f/k/a Standard Chlorine of Delaware, Inc. ("SCD," or "Godel"), a Delaware corporation. Neither corporation has conducted any active business operations for many years. SCCC is not affiliated with any other entity. A third wholly-owned SCC C subsidiary, Benclor, Inc., f/k/a Cloroben Chemical Corporation, ("Benclor" or "Cloroben") was dissolved in 2003. SNP has no subsidiaries or affiliates.

The chronology of the relationship between SCCC and the subsidiaries identified above is as follows:

- Godel: SCCC has been the sole shareholder of Godel since its incorporation as Standard Chlorine of Delaware, Inc. in 1965. SCD operated a chemical manufacturing facility in Delaware between 1966 and December 1998, when substantially all its business assets (including use of the name Standard Chlorine of Delaware, Inc.) were sold to an unrelated third party. In connection with the 1998 sale, Standard Chlorine of Delaware, Inc. changed its name to Godel, Inc. Godel's sole activities since the sale have been those necessary to an orderly winding down of its affairs. Note: Godel never conducted any manufacturing operations at the SCCC Site or elsewhere in New Jersey.

- SNP: See Response to Question 2.

- Cloroben: See Response to Question 2.

e) *How many employees does the Company have?*

Response of SCCC: Two.

Response of SNP: None.

2. *Describe in detail the Company's relationship with Standard Naphthalene Products Co. and Chloroben[sic] Chemical Corporation. For both entities, answer the following questions:*

- a) *was the Company a subsidiary or division of the entity;*
- b) *is the Company a corporate successor to the entity;*
- c) *has the Company assumed any liability or liabilities of the entity, or agreed to defend or indemnify, or otherwise in any way become responsible for any liabilities or obligations of the entity, either actual or potential;*
- d) *has the entity assumed any liability or liabilities of the Company, or agreed to defend or indemnify, or otherwise in any way become responsible for any liabilities or obligations of the Company, either actual or potential.*

Response of both SCCC and SNP: With respect to Standard Naphthalene Products Co., Inc. (SNP):

- a) *Was the Company a subsidiary or division of the entity?*

Response: No.

SNP, a New Jersey corporation, was incorporated as a wholly-owned subsidiary of SCCC in March, 1950. All SNP's common stock was owned entirely by SCCC from 1950 to 1962. Between 1962 and 1967 SCCC and Sun Oil Company each owned 50% of SNP's common stock. In 1967 SCCC acquired Sun's interest in SNP. From that date until the present, SCCC has been the sole stockholder of SNP.

SNP discontinued all business operations in 1981. Its sole remaining asset is its property located at 1015-1025 Belleville Turnpike, and designated as Block 287 Lots 48, 49, 51, 52, and 52R (collectively, the SNP property). The SNP property represents approximately two-thirds of the acreage of the Site.

Between about 1964 and 1981, SNP leased a portion of Lot 49 as well as equipment and tanks located thereon to SCCC for use in the Company's manufacturing operations.

- b) *Is the Company a corporate successor to the entity?*

Response: No.

- c) *Has the Company assumed any liability or liabilities of the entity, or agreed to defend or indemnify, or otherwise in any way become responsible for any liabilities or obligations of the entity, either actual or potential?*

Response: Yes. As described below, SCCC has assumed responsibility for

investigation and remediation of environmental contamination at the SNP Property.

On October 20, 1989, SCCC entered into an Administrative Consent Order (the SCCC ACO) with the New Jersey Department of Environmental Protection (NJDEP). Under the terms of the SCCC ACO, SCCC assumed responsibility for the investigation and remediation of the entire Site, including the SNP property.

SCCC also assumed certain potential liabilities and obligations of SNP with respect to investigation and remediation of environmental contamination under the SCCC ACO when it entered into that certain letter agreement dated October 17, 2003 (the PRG Letter Agreement) among Beazer East, Inc. (Beazer), SCCC, and Tierra Solutions, Inc. (Tierra), pursuant to which those three companies formed a PRP Group (the Group or the PRG) and agreed to jointly fund and implement the environmental remediation of the SCCC Site in accordance with the SCCC ACO.¹

- d) *Has the entity assumed any liability or liabilities of the Company, or agreed to defend or indemnify, or otherwise in any way become responsible for any liabilities or obligations of the Company, either actual or potential?*

Response: SNP discontinued all business operations on or about 1980 or 1981. No records have been found indicating SNP ever had responsibility for any liabilities or obligations of SCCC at any time.

2. With respect to Cloroben Chemical Corporation, n/k/a Benclor, Inc.:

- a) *Was the Company a subsidiary or division of the entity?*

Response: No.

SCCC was the sole shareholder of Benclor, Inc., from its 1957 incorporation as a New Jersey corporation named "Cloroben Chemical Corporation" until its dissolution in 2003. Between 1964 and 1993, Cloroben formulated drain-cleaners in Building No. 2 of Lot 50, which was owned by SCCC. Note: On or about December 2, 1998, substantially all the business assets of Cloroben Chemical Corporation, including the names "Cloroben" and "Cloroben Chemical Corporation", were acquired by an unrelated third party. In connection with that transaction, the name of Cloroben Chemical Corporation

¹ The PRG Letter Agreement was submitted previously to the USEPA.

was changed to Benclor, Inc. As stated above, Benclor was dissolved in 2003.

- b) *Is the Company a corporate successor to the entity?*

Response: No.

- c) *Has the Company assumed any liability or liabilities of the entity, or agreed to defend or indemnify, or otherwise in any way become responsible for any liabilities or obligations of the entity, either actual or potential?*

Response: Yes. As described below, SCCC has assumed responsibility for investigation and remediation of environmental contamination at the Benclor facility at the Site:

As stated above, between 1964 and 1993, Benclor operated a drain-cleaner formulating operation on Lot 50 of the Site. By virtue of SCCC's execution of the SCCC ACO, SCCC agreed to undertake performance of any obligations of Benclor with respect to the investigation and remediation of environmental contamination related to Benclor's operations at the Site.

Following its cessation of manufacturing operations at the Site in the first quarter of 1993, Benclor submitted ISRA Initial Notice and Site Evaluation Submissions to the New Jersey Department of Environmental Protection (NJDEP) and assigned ISRA Case #93261. In July, 1993 Benclor's ISRA obligations were formally subsumed under the SCCC ACO.

Any obligations and liabilities of Benclor under the SCCC ACO were assumed by SCCC as part of its obligations under the PRG Letter Agreement described above.

- d) *Has the entity assumed any liability or liabilities of the Company, or agreed to defend or indemnify, or otherwise in any way become responsible for any liabilities or obligations of the Company, either actual or potential.*

Response: No.

3. *Provide copies of all documents pertaining to any transactions between the Company and the entities referred to in Question 2.*

Response: All available documents relating to the status and relationship of the corporations discussed in Question 2 are available at the Company's offices. Please note that all business records of Cloroben were acquired by

Metachem, LLC in connection with Metachem's purchase of Cloroben's assets.

4. *Describe the transaction by which the Company acquired ownership of all or part of the Site property, and provide copies of all documents relating to the transaction.*

Responses of SCCC and SNP:

SCCC acquired the property located at 1035 Belleville Turnpike and designated on the Tax Map as Block 287, Lot 50 in October 1962.

SNP acquired the property located at 1015-1025 Belleville Turnpike and designated on the Tax Map as Block 187 Lots 48, 49, 51, 52, and 52R) in July 1962.

PDF copies of the documents relating to these transactions will be provided as soon as they can be prepared.

14. *Provide the names and addresses of any entities other than the Company of which you are aware that may have released or disposed of any material at the Site. Include in your response a description of the types of waste and the dates of disposal.*

Responses of SCCC and SNP:

Prior to acquisition of portions of the Site by SCCC (Lot 50) and SNP (Lots 48, 49, 51, 52, and 52R, several entities operated industrial facilities on portions of the SCCC Site. Data obtained in previous environmental investigations have indicated that spills, releases and/or discharges arising from the operations of these companies may have materially impacted environmental conditions at the Site.

Block 287, Lot 50: The following entities are known to have owned and/or operated industrial facilities on Lot 50 (now owned by SCCC)

- Cooper Industries, Inc. as successor to Thomas A. Edison, Inc.: Thomas A. Edison was the original industrial developer of Lot 50. Edison-related entities owned and operated a lead-acid battery manufacturing facility on Lot 50 from late 1929 until early 1954. SCCC has previously electronically submitted a PRP Identification Report to USEPA on Cooper Industries, Ltd, as successor to Thomas A. Edison, Inc. A copy of that report is attached. The enclosed Edison/Cooper Blueprints & Drawings DVD provides PDF copies of the drawings and figures referenced in that PRP Identification Report.

- **Tanatex Chemical Corporation (“Tanatex”):** Tanatex leased buildings and equipment on Lot 50 from the property’s respective owners from the mid-1950s until the 4th quarter of 1963. During these years it operated a dye-carrier manufacturing facility and research laboratory at the Site. After leaving Lot 50, Tanatex was acquired by Sybron Corp (NY). Since then it has undergone several additional corporate successions. A Preliminary PRP Identification Report on Tanatex, its operations, and its corporate successors is attached.
- **Keaton Rubber Co. (Keaton Rubber):** Keaton Rubber Products owned Lot 50 from 1959 until late 1962. It operated a manufacturing facility on a portion of Lot 50 and leased a portion of Lot 50 to Tanatex for the entire period of its ownership. It appears Keaton Rubber went out of business in the 1960s. No corporate successor is known. A preliminary PRP Identification Report on Keaton Rubber is attached.
- **Crown Rubber Products (“Crown Rubber”):** Crown Rubber, a manufacturer of molded rubber products, bought Lot 50 from Thomas A Edison, Inc. It used a portion of the old Edison Plant as a manufacturing facility for molded rubber products. It leased the rest of Lot 50 to others, possibly Keaton Rubber and Tanatex. It is no longer in business, and no successor corporation has been found. A preliminary PRP Identification Report on Crown Rubber will be provided to USEPA.

Block 287, Lots 48, 49, 51, 52, and 52R: Prior to the sale of these sections of the Site to SNP, the sole owners and operators of an industrial facility were Koppers, Inc. and related entities. In 1916 the White Tar Company acquired Lots 48 and 49 for use as a naphthalene processing facility which produced moth preventatives and various other products from coal tar naphthalene. These operations were continued and expanded after White Tar’s acquisition by the Koppers Company in 1929, and subsequently through the acquisition of Lots 51, 52, and 52 R from Thomas A. Edison, Inc. Beazer East, Inc., successor to Koppers, is a member of the PRG and has been participating in the investigation and remediation of the SCCC Site since the 1990s. Note: Numerous blueprints and drawings, as well as production manuals and other documentation with information about the operations conducted by White Tar/Koppers have been discovered. A schedule of these documents, together with additional information obtained from them, will be provided as soon as practicable.

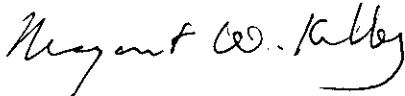
Chromite Ore Residue: Chromite ore processing residues were used as fill for approximate 75% of the surface area of the SCCC Site, which has been identified by the NJDEP as Hudson County Chromate Site #116. The origin of that fill is believed to have been the former Diamond Shamrock facility adjacent to the Site. In the early 1990s, Maxus, Inc. (Maxus) implemented various IRMs to address potential chromium contamination at the SCCC Site. Attachment C sets out a schedule of

documents related to the Diamond Shamrock facility and chromium contamination at the SCCC Site. Tierra Solutions, Inc. ("Tierra"), for itself and on behalf of OCC, has assumed responsibility for addressing chromium contamination at the Site pursuant to the terms of an NJDEP Administrative Consent Order, dated April 17, 1990. Tierra is a member of the PRG.

As stated above, responses to the other questions contained out in the Information will be provided as expeditiously as possible.

With thanks for your patience.

Yours sincerely,

A handwritten signature in cursive script, appearing to read "Margaret W. Kelly".

Margaret W. Kelly

Enclosures

Cc: Leena Raut, Assistant Regional Counsel (via electronic transmission)

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New York)

:

County of New York)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my Company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the Company's response thereto should become known or available to the Company.

STANDARD CHLORINE CHEMICAL CO., INC.
STANDARD NAPHTHALENE PRODUCTS CO, INC.

By: Margaret W. Kelly
NAME (print or type)

Vice President, General Counsel
TITLE (print or type)

Margaret W. Kelly
SIGNATURE

Sworn to before me this 21st day of July, 2008

Lisa V. Thomas
Notary Public
Notary Public, State of New York
Qualified in Kings County
My Commission Expires Sept. 20, 2010

SCCC Response to USEPA CERCLA 104(e) Information Request
Attachment A1
Schedule of Site Investigation and Remediation Documents
Mar 1983 to July 2003

Date	Document Identification	PDF	To EPA
1983-03-29	Letter dated Mar 29, 1983 from SCCC to NJDEP – re: Ground and Surface Water Investigation.		
1983-09-16	Letter dated Sept 16, 1983 from NJDEP to Weston with attached copies of analyses of SCCC Wells and soil samples.		
1983-02-28	NJDEP to SCCC re: Ground and Surface Water Investigation	X	
1983-08-23	NJDEP to SCCC – Dioxin Info Request	X	
1984-01	<i>Hydrogeologic Investigation, Standard Chlorine Chemical Company, Inc., Kearny, New Jersey</i> , (Weston, January 1984).	X	
1985-01-25	*Letter dated January 25, 1985 to SCCC from NJDEP re NJDEP "Phase II Dioxin Investigation."	X	
1985-07-03	*Letter dated July 3, 1985 from NJDEP to SCCC RE: 1035 Belleville Turnpike, Kearny, NJ 07032, w/ attached "Executive Order No. 109."	X	
1985-08-06	Cover letter dated 6 August 1985 from Weston to NJDEP with attached <i>Sampling Plan, Standard Chlorine Chemical Company, Kearny, New Jersey</i> (Weston, August 1985).	X	
1985-12	<i>Phase II Dioxin Site Investigation Final Report, Standard Chlorine Chemical Company, Inc., Kearny, New Jersey</i> , NJDEP Division of Waste Management, Hazardous Site Mitigation Administration, Trenton, New Jersey, (E. C. Jordan, December, 1985). ¹	X	
1986-04-24	NJDEP to SCCC re: April 7, 1986 meeting resolutions	X	
1986-05-06	Cover Letter dated May 6, 1986 from SCCC to NJDEP, with attached <i>Draft Work Plan for Immediate Removal of Dioxin Contaminated Sludge and Sampling and Analysis of Potentially Dioxin-Contaminated Sludges at the Waste Sludge Lagoons, Standard Chlorine Chemical Company, Kearny, New Jersey</i> (Weston, May 1986).	X	
1986-06-09	Cover letter dated June 9, 1986 from NJDEP to SCCC re: Standard Chlorine Chemical Co., Inc., Kearny, New Jersey [encloses E. C. Jordan Report]	X	
1986-06-19	Cover letter dated 19 Jun 1986 from NJDEP to SCCC w/ attached additional work plan comments.	X	
1986-10-10	Response letter dated October 10, 1986 from SCCC to NJDEP Re: NJDEP September 18 [sic], 1986 comment letter; work plan revisions.	X	
1986-11-26	Response letter dated November 26, 1986 from SCCC to NJDEP with <i>Work Plan Addendum to 17 October 1986 Work Plan</i> .	X	

¹ Transmitted to SCCC in June 1986

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Date	Document Identification	PDF	To EPA
1987-04-23	Letter dated 23 Apr 1987 from NJDEP to Weston re Standard Chlorine Chemical Company - Kearny NJ, discussing sampling conducted between 25 Feb and 18 Mar 1987.		
1987-09	<i>Stage I Analysis Report for: Sampling and Analysis of Potentially Dioxin-Contaminated Materials in Waste Lagoons. Volume I, Summary of Stage 1 Efforts, Appendix A: Boring Logs</i> (Weston, September 1987).	X	
1987-09	<i>Stage I Analysis Report for: Sampling and Analysis of Potentially Dioxin-Contaminated Materials in Waste Lagoons. Volume II Appendix B: Report Numbers 1 and 2</i> (Weston, September 1987).		
1987-09-16	Cover letter dated September 16, 1987 from SCCC to NJDEP transmitting <i>Stage 1 Analysis Report, Sampling and Analysis of Potentially Dioxin-Contaminated Materials</i> .	X	
1987-11-16	Letter dated 16 November 1987 Weston to NJDEP Re: Dioxin Sampling and Analysis, w/ attached corrected maps of sampling locations.	X	
1988-02-09	Comment letter dated 9 Feb 1988 from NJDEP to SCCC – Comments on Submittals	X	
1988-03-08	Response letter dated March 8, 1988 from SCCC to NJDEP - response to NJDEP letter dated February 9, 1988.	X	
1988-04-20	Cover Letter from SCCC to NJDEP with attached ENSECO dioxin calibration data.	X	
1988-05	<i>Stage II and III Analysis Report for: Sampling and Analysis of Potentially Dioxin-Contaminated Materials in Waste Lagoons, Standard Chlorine Chemical Company, Kearny, New Jersey, Summary of Stage II and III Efforts, Stage II and III Analytical Report</i> (Weston, May 1988).		
1988-05-08	Letter dated May 5, 1988 from SCCC to NJDEP re status update & distillation bldg proposal [w/o attachment].	X	
1989-10-20	NJDEP/SCCC Administrative Consent Order dated October 20, 1989 and appendices (2 files)	X	
1989-11-17	Cover letter dated Nov. 17, 1989 from SCCC to NJDEP (w/o referenced attachment: Interim Remedial Measures Work Plan).		
1989-11-20	<i>Draft Interim Remedial Measures Work Plan, Standard Chlorine Chemical Corporation, Kearney, New Jersey</i> (Weston, November 11, 1989)		
1990-01	<i>Draft Remedial Investigation Work Plan for the Standard Chlorine and Chemical Corporation</i> (Weston, January 1990).		
1990-01-12	*Comment letter dated 12 JAN 1990 from NJDEP to SCCC Re: Interim Remedial Measures Work Plan (IRM WP) dated November 20, 1989.		
1990-01-17	Cover letter dated January 17, 1990 from SCCC to NJDEP transmitting revised <i>Draft Remedial Investigation Work Plan the Standard Chlorine And Chemical Corporation, Kearny, New Jersey</i> (Weston, January 1990).		
1990-01-25	Response letter dated January 25, 1990 from SCCC to NJDEP Re: Interim Remedial Measures Work Plan - response to NJDEP Jan 12, 1990 comments.		
1990-02-16	<i>Final Interim Remedial Measures Work Plan, Standard Chlorine Chemical Corporation,</i>	X	5/22/08

Date	Document Identification	PDF	To EPA
	<i>Kearney, New Jersey</i> (Weston, February 16, 1990).		
1990-04-03	*Comment Letter dated 03 APR 1990 from NJDEP to SCCC re January 1990 RI Work Plan.	X	
1990-04-12	*Approval letter dated 12 Apr 1990 from NJDEP to SCCC Re: Compliance with the October 29, 1989 Administrative Consent Order Regarding the Interim Remedial Measures Work Plan (IRM WP), February 16, 1990.	X	
1990-04-17	*Letter dated 17 Apr 1990 from NJDEP to SCCC re: Remedial Investigation Work Plan, NJDEP Comments Dated April 3, 1990.	X	
1990-04-27	Letter dated April 27, 1990 from SCCC to NJDEP – Site Reconnaissance & RIWP schedule.	X	
1990-05	<i>Remedial Investigation Work Plan for the Standard Chlorine Chemical Company, Kearny, NJ</i> (Weston, May 1990).	X	5/22/08
1990-05-04	NJDEP Memorandum to File dated May 4 1990 re: SCCC Meeting April 26, 1990 to discuss Department's April 3, 1990 RIWP comments.	X	
1990-05-23	Cover letter dated May 23, 1990 from SCCC to NJDEP w/ attached 1990, 1 st Qtr Quarterly Progress Report (Weston).	X	
1990-07-02	Letter dated July 2, 1990 from SCCC to NJDEP. Request for approval of IRM modifications.	X	5/22/08
1990-07-05	Cover letter dated 05 Jul 1990 from NJDEP to SCCC Re: <i>Revised Remedial Investigation Work Plan</i> dated May 1990, w/ attached NJDEP "Remedial Investigation Work Plan (May 1990) Comments."	X	
1990-07-10	NJDEP 10 July 1990 Memorandum to File, re: June 29, 1990 meeting with Standard Chlorine Chemical Co.	X	
1990-07-16	*Letter dated 16 Jul 1990 from NJDEP to SCCC – Approval of IRM WP modifications	X	
1990-07-23	*Cover letter dated 23 Jul 1990 from NJDEP to SCCC Re: Health and Safety Plan for Remedial Investigation, w/ attached comments of Department on the HASP.	X	
1990-08-09	Cover letter dated August 9, 1990 from SCCC to NJDEP Re: Standard Chlorine Chemical Company Administrative Consent Order, with attached, "Addendum to the RI Work Plan, Standard Chlorine," (Weston).	X	5/22/08
1990-08-15	Cover letter dated August 15, 1990 from SCCC to NJDEP w/ attached 1990 2 nd Quarter Progress Report (Weston).	X	
1990-08-23	Letter dated August 23, 1990 from SCCC to NJDEP. Notification of IRM mobilization date.	X	
1990-09-04	Letter dated September 4, 1990 from HMDC to SCCC re: Std. Chlorine Temporary Trailer, File #90-560 [letter approves temporary zoning certificate]		
1990-09-21	Letter dated Sep 21 1990 from Weston to NJDEP. Response to NJDEP HASP comments.	X	
1990-10-26	*Approval letter dated Oct 26 1990 from NJDEP to SCCC re: <i>Remedial Investigation Work Plan</i> (May 1990).	X	
1990-10-29	*Letter dated Oct 29 1990 from NJDEP to SCCC. Approval Health and Safety Plan (HASP) revisions dated September 21, 1990.	X	

Date	Document Identification	PDF	To EPA
1990-11-12	Cover letter dated November 12, 1990 from SCCC to NJDEP w/ attached 1990 3 rd Qtr Progress Report (Weston).	X	
1990-11-12	Letter dated November 12, 1990 from SCCC to NJDEP, notifying the Department of scheduled commencement of RI field activities on or about November 26, 1990.	X	
1990-11-30	Letter dated NOV 30 1990 from NJDEP to Kearny Board of Health re: Standard Chlorine Chemical Company, 1035 Belleville Turnpike, Kearny, New Jersey	X	
1990-12-26	Letter dated December 26, 1990 from SCCC to NJDEP. Notification of IRM completion.	X	
1991-01-15	Cover letter dated January 15, 1991 from SCCC to NJDEP with attached 1991 4 th Qtr Progress Report (Weston).	X	
1991-01-16	Letter dated Jan 16, 2001 from NJDEP to SCCC. Approval of IRM work	X	
1991-04-30	Notification letter from SCCC to NJDEP re: transmittal under separate cover of analytical data packages for samples collected at Kearny site	X	
1991-05-01	Transmittal letter dated May 1, 1991 from SCCC to NJDEP, with attached 1991 1 st Qtr Progress Report (Weston).	X	
1991-05	<i>Analytical Results of Surface Sampling and Groundwater Sampling - December 1990 & January 1991</i> (Weston, January 1991)	X	5/22/08
1991-07-09	*Letter dated Jul 09 1991 from NJDEP to SCCC Re: Standard Chlorine Chemical Co., Kearny, Hudson County, Remedial Investigation – Phase II RI	X	
1991-08-06	Cover Letter dated August 6, 1991 from SCCC to NJDEP with attached Supplemental RI Work Plan outline.	X	
1991-08-06	Attachment to Aug 6, 1991 letter from SCCC to NJDEP – Groundwater Elevations and Well Locations	X	
1991-10-03	Transmittal letter dated October 3, 1991 from SCCC to NJDEP with attached Sixth Quarterly Progress Report of ACO activities.		
1991-10-08	Transmittal letter dated October 8, 1991 from SCCC to NJDEP with attached Seventh Quarterly Progress Report of ACO activities.		
1991-11-27	Letter dated November 27, 1991 from SCCC to NJDEP re delays in remedial investigation field activities occasioned by delay in NJDEP approval.		
1992-01-06	*Comment Letter dated 6 Jan 1992 from NJDEP to SCCC re: August 1991 <i>Draft Supplemental Work Plan Outline</i>	x	
1992-01-22	Letter from SCCC to NJDEP with Revised RI Schedule.	X	
1992-01-24	Letter dated January 24, 1992 from SCCC to NJDEP, responding to NJDEP January 6, 1992 comments on August 1991, Draft Supplemental Work Plan.	X	
1992-01-29	*Letter dated 29 Jan 1992 from NJDEP to SCCC Re: Data Validation Review of Analytical Package Submitted by ETC Corp.	X	
1992-02-26	Transmittal letter dated Feb 26, 1992 from SCCC to NJDEP - calibration verification data.	X	

Date	Document Identification	PDF	To EPA
1992-02-27	Cover letter dated February 27, 1992 from SCCC to NJDEP w/ attached 1991 4 th Qtr Progress Report (Weston).	X	
1992-05-13	Response letter dated May 13 1992 from NJDEP to SCCC re: SCCC Response to NJDEP 01/24/92 comment letter.	X	
1992-06-10	Letter dated 10 Jun 1992 from NJDEP to SCCC re: SCCC request for a meeting concerning the Phase II RIWP	X	
1992-07-21	Letter dated Jul 21, 1992 from SCCC to NJDEP – Proposed SRI Phase II sampling activities.	X	
1992-08-11	Letter dated 11 Aug 1992 from NJDEP to SCCC – Concerns re Method 680 for PCB Analysis	X	
1992-09-08	Conditional approval letter dated Sep 08 1992 from NJDEP to SCCC re: <i>Supplemental Work Plan</i> Dated August 5, 1992 for the Remedial Investigation at the Kearny, New Jersey Site.	X	
1993-01-15	Results of Oct 1992 supplemental sampling (attachment to letter from SCCC to NJDEP).	X	
1993-02-02	Letter dated 02 Feb 1993 from NJDEP to SCCC. Response to Jan 15, 1993 letter and data.	X	
1993-02-09	Letter dated February 9, 1993 from NJDEP to SCCC re: SCCC, Meeting to be held February 25, 1993.		
1993-02-10	Letter dated February 10, 1993 from SCCC to NJDEP, responding to NJDEP 2 Feb 1993 letter.		
1993-03-12	Letter from Weston to NJDEP Slug Tests & Tidal Study Results (attached).	X	
1993-04-19	Letter from SCCC to NJDEP – Response re use of Method 680.	X	
1993-05	<i>Draft Remedial Investigation Report</i> (Weston, May 1993).	X	5/22/08
1993-07-12	Cover letter dated July 12, 1993 from SCCC to NJDEP, attaching Fourteenth Quarterly Progress Report.		
1995-08-11	Comment letter dated 11 Aug 1995 from NJDEP to SCCC re: SCC, Kearny, Hudson County, New Jersey, ACO Executed on October 20, 1989 - <i>Draft Remedial Investigation Report</i> dated May 1993 – NJDEP Comments.	X	7/3/08
1995-10-18	Letter dated October 18, 1995 from ERM to NJDEP – Mtg summary; response to NJDEP comments; FRI Work Plan Outline.	X	7/3/08
1995-11-08	*Comment letter dated Nov 8 1995 from NJDEP to SCCC re: Response to NJDEP 11 Aug 1985 comment letter.	X	7/3/08
1995-12-07	Focused RI (FRI) Work Plan (ERM, 7 Dec 1995)		
1995-12-08	Transmittal letter from ERM to NJDEP with FRI WP (not attached)	X	7/3/08
1996-03-01	*Comment letter dated Mar 01 1996 from NJDEP to SCCC Re: SCCC Kearny, Hudson County NJ, ACO Executed on October 20, 1989 – <i>FRI Work Plan</i> dated December 1995.	X	7/3/08
1996-04-12	Response Letter dated 12 April 1996 from ERM to NJDEP re: SCCC Site in Kearny, NJ, Summary of 3 April 1996 Conference Call and Responses to NJDEP Comments on the 8 December 1995 FRI Work Plan.	X	7/3/08

Date	Document Identification	PDF	To EPA
1996-04-15	<i>Focused Remedial Investigation (FRI) Work Plan Standard Chlorine Chemical Company Inc. and Standard Naphthalene Products Inc. Site, Kearny, NJ (ERM, Apr 15, 1995). [Revised FRI WorkPlan]</i>		
1996-05-31	Letter dated 31 May 1996 from NJDEP to SCCC re: SCCC Kearny, Hudson County, NJ ACO executed on October 20, 1989, Focused Remedial Investigation Work Plan Dated December 1995 and Revised April 1996. FRI Work Plan approval and comments.	X	7/3/08
1996-07-19	Fax dated Jul 19, 1996 from ERM to NJDEP transmitting Technical memo: July 1996 Geophysical Survey.	X	7/3/08
1996-10-11	Notification letter from NJDEP to SNP – Old White Tar Well.	X	7/3/08
1996-11-13	Letter dated Nov 13, 1996 with Workplan for Closure of White Tar Production Well.	X	7/3/08
1996-12-30	Letter dated Dec 30, 1996 with Revised Old Production Well Closure Work Plan	X	7/3/08
1997-01	<i>Proposed Remedial Action Plan (PRAP), Standard Chlorine Chemical Company Inc. and Standard Naphthalene Products Inc. Site, Kearny, New Jersey (ERM, January 1997).</i>	X	7/2/08
1997-01	<i>PRAP Appendix A-FRI Report (ERM, January 1997).</i>	X	7/3/08
1997-06-03	*Comment Letter dated Jun 03 1997 from NJDEP to SCCC Re: SCCC, ACO, <i>Proposed Remedial Action Plan</i> and <i>Focused Remedial Investigation Report</i> .	X	
1997-06-17	* Letter dated Jun 17 1997 from NJDEP to SCCC – Conditional approval, Work Plan for Closure of Old Production Well dated November 13 and amended on December 30, 1986.	X	
1997-07-24	SCCC to NJDEP – ECDC Remedial Approach_Cvr Ltr and Exhibits	X	
1997-08-04	Letter dated August 4, 1997 from ITEX to NJDEP with attached, "Whitepaper: Brownfield Redevelopment Using Processed Dredged Material SCCC and SNPC Site, Kearny, New Jersey."	X	
1997-09-08	Cover Letter dated September 8, 1997 from SCCC to NJDEP with attached "Scoping Letter for Supplemental Investigation" (Key, September 5, 1997).	X	
1997-10-17	*Comment letter dated Oct 17 1997 from NJDEP to SCCC Re: Scoping Letter for Supplemental Investigation dated September 8, 1997.	x	
1997-11-20	<i>Revised Supplemental Remedial Investigation Work Plan (Key, November 20, 1997).</i>		
1998-01-09	*Comment Letter dated Jan 09 1998 from NJDEP to SCCC -Re: 20 Nov 1997 Revisions to September 8, 1997 "Scoping Letter for Supplemental Investigation."	X	
1998-02-18	*Letter dated Feb 18 1998 from NJDEP to SCCC – Agreements reached at 02-04-98 Mtg.	X	
1998-02-24	Letter dated Feb 24, 1998 from SCCC to NJDEP – Transmission Supplemental Information.	X	
1998-07-15	Letter dated July 15, 1998 from NJDEP to SCCC – Follow-up to NJDEP 18 Feb 1998 letter.	X	
1998-09-29	Letter dated Sep 29, 1998 from NJDEP to SCCC – SRI activities.	X	
1998-09-30	Letter dated Sept 30, 1998 from SCCC to NJDEP – Notification of start of SRI activities.	X	
1998-10-02	Letter dated Oct 2, 1998 from NJDEP to SCCC – Deadline for start of SRI activities.	X	

Date	Document Identification	PDF	To EPA
1998-10-30	Letter dated Oct 30, 1998 from SCCC to NJDEP – Notification of start of SRI activities.	X	
1998-11-13	Letter dated Nov 13, 1998 from Key to NJDEP with attached Results from sampling of Old Production Well.	X	
1998-11-25	Letter dated Nov 25, 1998 from NJDEP to SCCC – Comments on Proposed Brownfields Redevelopment Plan and SRI .	X	
1998-12-02	Letter dated Dec 2, 1998 from Key to NJDEP – Response to NJDEP 11-25-98 comment letter; schedule for completion of SRI activities.	X	
1998-12-09	Letter dated 09 Dec 1998 from NJDEP to SCCC – Comments on Old Production Well GW Sampling Results.	X	
1998-12-10	Letter dated 10 Dec 1998 from NJDEP to SCCC – NJPDES Permit by Rule (Old Production Well).	X	
1999-01-04	Letter dated Jan 4, 1999 from Key to NJDEP Re: Schedule for Completion of Field Work, Standard Chlorine Chemical Company, Inc. Site, Kearny, New Jersey, with attached site map.	X	
1999-01-08	Letter dated Jan 8, 1999 from Key to NJDEP – Schedule, Closure of Old Production Well.	X	
1999-04-08	Cover letter dated Apr 8 from Key to NJDEP - SRI Report transmittal letter.	X	
1999-04	<i>Supplemental Remedial Investigation Report, Standard Chlorine Chemical Company, Kearny, New Jersey (Key Environmental, April 1999). [7 pdf files]</i>	X	
1999-04-09	Transmittal letter dated April 9, 1999 from Key to NJDEP – Transmittal of SRI analytic data.		
1999-04-09	Cover letter dated April 9, 1999 from to NJDEP re: Supplemental Remedial Investigation Report, Standard Chlorine Chemical Company Site, Kearny, NJ, NJDEP Case No. NJD002175057 with following enclosures: <ul style="list-style-type: none"> - Regulatory Format Data Package: Sampling Date: October 9, 1998, Key Environmental, Inc., Project: Standard Chlorine/Production Well, prepared by Severn Trent Laboratories, (Certification Number 14530) STL Job No. 20980-84520, Volumes 1- 4 of 4. - Regulatory Format Data Package. Sampling Date: October 8, 1998, Key Environmental, Inc., Project: Standard Chlorine /Production Well, prepared by Severn Trent Laboratories (Certification number 14530), STL Job No. 20980-84519, Volume 1 of 1. - Regulatory Format Data Package. Sampling Date: January 13, 1999, Key Environmental, Inc., Project: Standard Chlorine, prepared by Severn Trent Laboratories (Certification number 14530), STL Job No. 20990-90164, Volume 1 of 1. - Regulatory Format Data Package. Sampling Date: February 2, 1999, Key Environmental, Inc., Project: Standard Chlorine, prepared by Severn Trent Laboratories (Certification number 14530), STL Job No. 20990-90424, Volume 1 of 1. - Diskette with electronic copy of the analytical results in the NJDEP HazSite database format. 		
1999-07-02	*Letter dated 02 Jul 1999 from NJDEP to SCCC - Conditional Acceptance SRI Report; comments. [n.b. remaining RI activities to be completed during RA phase].	X	
1999-08-26	Transmittal letter from NJDEP to ESI with attached draft ACO Amendment.	X	

Date	Document Identification	PDF	To EPA
1999-10-22	Letter dated 22 Oct 1999 from NJDEP to ESI – Comments on ESI Conceptual Plan for Site Remediation.	X	
1999-12-02	Letter dated December 2, 1999 from ESI to NJDEP – Supplemental Information, Conceptual Plan.	X	
2000-05-19	Directive dated 19 May 2000 from NJDEP to SCCC – Directive to inventory containerized materials.	X	
2000-06-05	Container RAWP (ESI June 5, 2000) with HASP	X	
2000-08-01	Letter from NJDEP to SCCC – Comments on Jun 5, 2000 Container RAWP	X	
2000-10-05	Transmittal letter dated 05 Oct 2000 from NJDEP to ESI with attached ACO amendment adding Kearny Properties	X	
2000-10-23	Letter dated Oct 23, 2000 from ESI to NJDEP – Containerized materials	X	
2000-10-26	Letter from ESI to NJDEP – Offsite Disposal of Containerized materials	X	
2000-11	<i>Remedial Action Work Plan (RAWP) (ESI, Nov 2000)</i>		
2000-11-07	Letter from ESI to NJDEP – Summary of activities; containerized materials	X	
2000-11-07	Letter dated Nov 7, 2000 from ESI to NJDEP with attached drum storage inventory	X	
2000-11-14	Storm water drain IRM (ESI, Nov 14, 2000)	X	
2001-01-12	Letter dated 12 Jan 2001 from NJDEP to SCCC – Remedial Action and Schedule required.	X	
2001-01-25	Letter from NJDEP to USEPA requesting USEPA Removal Action	X	
2001-01-28	Letter dated Jan 28, 2001 – Response to NJDEP letter dated 01-12-01	X	
2001-03-13	Letter dated Mar 13, 2001 from NJDEP to Tierra – Direction to begin RI and RA of Chromium Site 116 (aka SCCC Site).	X	
2001-05-04	Letter dated 04 May 2001 from ESI to NJDEP – Cvr letter with attached letter of intent between Kearny Properties, LLC and SPC Kearny, LLC	X	
2003-07-15	Letter dated 07 Jul 2003 from SPC Kearny (Genova) to NJDEP – Proposed Brownfields Redevelopment	X	
2003-07	<i>Interim Remedial Measures Workplan (Key Environmental, July 2003)</i>	X	

SCCC Response to USEPA CERCLA 104(e) Information Request
Attachment A
Schedule of Site Investigation and Remediation Documents
Oct 2004 to 2008

Date	Document Identification	PDF	To EPA
2003-11-19	Declaration of Covenants & Restrictions, Block 287 Lots 48-52R (note – transmitted as 3 files due to size)	X	
2003-10-17	PRG Letter Agreement	X	
2003-12-03	Letter from PRG (Beazer) to NJDEP – RCRA Status of Lagoon Material	X	
2004-03-30	Letter from PRG (Beazer) to NJDEP – Submittal of Draft Interim Response Action Workplan (IRAW) for SCCC and Diamond Sites	X	
2004-03	<i>Draft Interim Response Action Workplan (IRAW) Standard Chlorine Chemical Site and Diamond Site</i> (Key Environmental, March 2004)	X	
2004-06	<i>Work Plan for Phase I Asbestos Management and Select Building Demolition</i> (Key Environmental, June 2004).	X	
2004-08-05	Letter from Key to NJDEP with 2004 2nd Qtr Progress Report (Key)	X	
2004-08-20	Letter dated Aug 20 2004 from NJDEP to PRG (Beazer) – Response to IRAW	X	
2004-08-24	Letter dated Aug 24, 2004 from PRG (Beazer) to NJDEP – Response to NJDEP letter dated July 30, 2004 – IRAW implementation	X	
2004-09-21	Letter dated Sept 21, 2004 from PRG (Beazer) to NJDEP – Response to NJDEP letter dated 08-24-2004	X	
2004-10-04	Transmittal letter dated Oct 8, 2004 from PRG(Beazer) to NJDEP with attached <i>Solidification Treatability Study Work Plan</i> (Key Environmental, October 2004)	X	
2004-10-27	Transmittal letter dated Oct 27, 2004 from Key to NJDEP with <i>Pre-Design Investigation Workplan (Vol 1 of 2)</i> , Key Environmental, October 2004.	X	
2004-11-15	Letter dated Nov 15, 2004 from Key to NJDEP with Third Quarter 2004 Progress Report	X	
2005-01-04	Power-Point Presentation for NJDEP Mtg, Jan 4 2005	X	
2005-01-12	Power-point presentation for NJDEP Meeting on Jan 12, 2005 (Part 1)	X	
2005-01-12	Power-point presentation for NJDEP Meeting on Jan 12, 2005 (Part 2)	X	
2005-02-15	Transmittal letter dated 2 Feb 2005 from Key to NJDEP with attached 2004 4 th Qtr Progress Report	X	
2005-02-28	Letter dated Feb 28, 2005 from NJDEP to SCCC – Required Activities and Schedule	X	
2005-03-05	Letter from SCCC to NJDEP – Contact designation	x	
2005-03-23	Letter from SCCC (Lowenstein) to NJDEP – Outstanding Issues	X	

Date	Document Identification	PDF	To EPA
2005-04-14	Letter from NJDEP to SCCC – Submittal Certification Requirements	X	
2005-04-14	Letter from NJDEP to SCCC – Submittal Certifications	X	
2005-07	<i>Overview of Proposed Work for Supplemental Remedial Investigation (Key)</i>	X	
2005-09-20	Slides of Presentation made to NJDEP at Sept 20, 2005 mtg	X	
2005-12-20	Transmittal letter dated Dec 20, 2005 from Langan to NJDEP with <i>PDI Workplan, Vol. II of II (Appendices A-D)</i> , Key Environmental (Dec 2005)	X	
2005-07	Data maps of Contamination at SCCC and Diamond Sites (41 files)	X	
2006-01-31	Letter dated Jan 1, 2006 from NJDEP to SCCC and Tierra – Conceptual Approval Mar 2004 IRAW	X	
2006-02-14	Letter dated Feb 2, 2006 from SCCC (Langan) to NJDEP – Mar 2004 IRAW, Planning and Permit-Acquisition Schedule, with attached schedules	X	
2006-04-04	Letter dated Apr 4, 2006 from NJDEP to SCCC and Tierra – Comments on Mar 2004 IRAW	X	
2006-05-08	Letter dated May 8, 2006 from NJDEP to SCCC and Tierra – Comments on Oct 2004 Pre-Design Work Plan	X	
2006-06-23	Letter dated Jun 23, 2006 from PRG (Key) to NJDEP transmitting IRAW modifications, incorporating revisions to IRAW, PDI work plan and Treatability study; also responses to NJDEP comments on these submittals	X	
2006-06	<i>Interim Response Action Workplan (IRAW), Standard Chlorine Chemical Co Site and Diamond Site</i> (Key Environmental, June 2006).	X	
2006-07-03	Letter dated Jul 3, 2006 from Key to NJDEP - Request for use of USEPA AOC Policy	X	
2006-07-24	Letter dated Jul 24, 2006 from NJDEP to USEPA – Use of EPA AOC Policy	X	
2006-08-25	Letter dated Aug 25, 2006 from Rutgers Environmental Law to NJDEP – AOC Proposal	X	
2006-08-29	Letter dated Aug 29, 2006 from Langan to NJDEP – Discovery of concrete vault	X	
2006-09-08	Letter dated Sep 8, 2006 from USEPA to NJDEP – AOC Policy	X	
2006-09-21	Letter dated Sep 21, 2006 from NJDEP to SCCC and Tierra – AOC Policy	X	
2006-10-04	Letter dated Oct 4, 2006 from SCCC (Langan) to NJDEP – Proposal for use of AOC Policy (with Exhibits)	X	
2006-10-04	Letter dated Oct 4, 2006 from Langan to NJDEP - Response to Eastern Env letter on AOC Policy.	x	
2006-10-25	Transmittal Letter from PRG (Langan) to NJDEP – Waste Classification Request, Concrete Vault	X	
2006-11-10	Letter dated Nov 10, 2006 from PRG (Langan) to NJDEP – Response to USEPA Comments on application of AOC Policy	X	
2007-04-11	NJDEP Notice of Deficiency dated Apr 11, 2007 - IRAW	X	
2007-05-25	Cvr letter from Key to NJDEP - transmitting revised IRAW, with responses to NOD	X	

SCCC Response to CERCLA 104(e) Response
Attachement - B
Schedule of Industrial Site Recovery Act (ISRA) Documents
Cloroben Chemical Corp (Cloroben) Block 287, Lot 50

Date	Description	PDF	To EPA
1993-04-27	Letter dated Apr 27, 1993 from Lowenstein to NJDEP with attached ISRA Initial Notice for Block 287, Lot 50.	x	5/22/08
1993-06-15	Letter dated Jun 15, 1993 from Lowenstein to NJDEP with attached ISRA SES for Block 87, Lot 50.	x	5/22/08
1993-06-18	Letter from NJDEP to Lowenstein – ISRA Submission Status.	x	5/22/08
1993-06-28	Letter from Lowenstein to NJDEP – ISRA, small business submission.	x	5/22/08
1993-06-30	Letter from NJDEP to Lowenstein – ISRA, additional information required.	x	5/22/08
1993-07-07	Lowenstein to NJDEP – Submission of ISRA Fee.	x	5/22/08
1993-07-19	Letter from NJDEP to Lowenstein – Initial Notice Complete.	x	5/22/08

SCCC Response to USEPA CERCLA 104(e) Information Request
Attachment C
Schedule of Chromium Documents
Mar 1983 to July 2003

Date	Document Identification	PDF	To EPA
1974-03-28	<i>Report of Subsurface Soils Investigation, Diamond Shamrock Chemical Co., Hudson County</i> (Wehran Engineering Corporation, Mar 28, 1974).		
1982-12-07	<i>Supplementary Hydrogeologic Investigation, Diamond Shamrock Corporation, Kearny Plant Site</i> (GeoEngineering, Inc. Dec 7, 1982).		
1985-12	<i>Remedial Measures Investigation: Facility Closure Analysis, Diamond Shamrock Chemicals Company Kearny Plant, Kearny, New Jersey</i> , prepared for Diamond Shamrock Chemical Company (Woodward-Clyde Consultants, Dec 1985) – note, includes SCCC Site.		
1988-08-24	Paul Herring (Maxus) to NJDEP – Diamond Shamrock Chemicals Company – Historical Names Changes and Successorship.		
1988-12-13	NJDEP to SCCC – Chromate Contamination of Identified Property as Listed on Attached Sheet.		
1989-06-13	<i>QAAP for Air Sampling</i> (ChemRisk, June 13, 1989).		
1989-06-16	<i>Interim Remedial Measures (draft), Chromite Ore Processing Sites, Hudson County, New Jersey – Table of Contents; pp 1-1 to 5-11</i> (ERM, June 16, 1989),		
1989-06-16	<i>Draft IRM, QAAP</i> (ERM, June 16, 1989)		
1989-06-16	<i>Draft IRM, HASP</i> (ERM, June 16, 1989)		
1989-06-16	<i>Draft IRM, Field Sampling Plan</i> (ERM, June 16, 1989)		
1989-07-05	Letter dated 05 Jul 1989 from NJDEP to Maxus – NJDEP Conditional Approval and Comments on June 16, 1989 IRM Work Plans.		
1989-11-20	SCCC Inter-Office memo dated Nov 20, 1989 re DOH Chromium Study, with attached survey results and fact sheets.		
1989-11-21	<i>Proposed Site Closure Plan, Lots 46, 47, 47R, Block 287, Town of Kearny, Hudson County, New Jersey – Vol. I, Design Report</i> (EFP Associates, Inc, November 21, 1989		
1989-11-21	<i>Proposed Site Closure Plan, Lots 46, 47, 47R, Block 287, Town of Kearny, Hudson County, New Jersey – Vol. II, Technical Considerations</i> (EFP Associates, Inc, November 21, 1989		
1989-12-22	Letter dated Dec 22 1989 from NJDEP to Maxus, OCC, CLH et al Re: Hudson County, NJ Chromate Production Waste Sites – Human Exposure Assessment, with attached NJDEP Directive.		
1990-01-25	OCC (Cohen, Shapiro) to NJDEP – Re: NJDEP 12/22/1989 Directive – Human Exposure Assessment, Hudson Co Chromate Sites		
1990-01-25	SCCC to NJDEP – Response to NJDEP 01-12-90 comments to IRM Work Plan		
1990-02-06	Letter dated Feb 6, 1990 from Maxus to SCCC – Chromium contamination on SCCC Property.		
1990-02-14	Letter dated Feb 14, 1990 from SCCC to NJDEP – Additional Response to Paragraph 6 of NJDEP 01-12-90 letter		

SCCC Response to USEPA CERCLA 104(e) Information Request
Attachment C
Schedule of Chromium Documents
Mar 1983 to July 2003

Date	Document Identification	PDF	To EPA
1990-03-06	Letter dated March 6, 1990 from SCCC to NJDEP - re chromium IRMs etc.		
1990-03-09	NJDEP internal memorandum dated 09 MAR 1990 re: SCCC Meeting, 3/1/90 re chromium IRMs.		
1990-03-09	Letter dated 09 MAR 1990 from NJDEP to SCCC re: <i>IRM Work Plan for Chromium Contamination</i> .		
1990-03-15	Cover letter dated March 15, 1990 from SCCC to NJDEP with attached "Draft Outline for Work Plan to Address Chromium Contamination" at the SCCC Site.		
1990-03-27	Letter dated Mar 27, 1990 from Maxus to SCCC re: Chromium Contamination on SCCC Property – Interim Remedial Measures (IRMs).		
1990-04-04	*Comment letter dated 04 APR 1990 from NJDEP to SCCC Re: IRM Work Plan for Chromium.		
1990-05	<i>Draft Work Plan to Address Chromium Contamination at the Standard Chlorine Chemical Company</i> (Weston, May 1990).		
1990-05-08	Cover letter dated May 8, 1990 from SCCC to NJDEP Re: Interim Remedial Measures Workplan - Chromium, w/ attached <i>Draft Work Plan to Address Chromium Contamination at the Standard Chlorine Chemical Company</i> (May 1990).		
1990-05-14	Letter dated May 14, 1990 from Maxus to SCCC – chromite ore IRMs at SCCC Site pursuant to OCC Apr 17, 1990 ACO		
1990-05-24	Drawing, "Boundary & Topographic Survey, D.E.P Site # 116, Lots, 48, 49, 50, 51, 52, Block 287", Sheet No 2 of 2 (The Chester Partnership, May 24, 1990).		
1990-06-15	<i>Draft [Chromium] Interim Remedial Measures Work Plan FOR Standard Chlorine, NJDEP Site Identification No. 116</i> (EFP Associates, Inc, June 15, 1990).		
1990-05-21	Letter dated May 21, 1990 from SCCC to Maxus – Re Chromium Contamination on SCCC Property – Conduct of Interim Remedial Measures (IRMs).		
1990-06-11	Letter dated 11 Jun 1990 from NJDEP to SCCC – NJDEP comments on Chromium IRM Work Plan dated May 1990		
1990-06-11	Letter dated 11 Jun 1990 from NJDEP to SCCC Re: Interim Remedial Measures Work Plan (IRM WP) for Chromium dated May 1990.		
1990-07-02	Letter dated 07-02-1990 from SCCC to NJDEP – re: IRM Workplan Chromium.		
1990-07-10	NJDEP memo to File dated 10 Jul 1990 – June 29, 1990 meeting with SCCC re chromium IRMs.	X	
1990-08-02	Letter dated 02 Aug 1990 from NJDEP to SCCC Re: "Chromium IRMs at Standard Chlorine Chemical Company (SCCC) Kearny, Hudson County Site - October 20, 1989 Administrative Consent Order (ACO) - Respective responsibilities of Maxus and SCCC to develop and implement chromium IRMs at SCCC Site.	X	
1990-09-17	*Letter dated Sep 17 1990 from NJDEP to SCCC Re: Remedial Investigation Work Plan (RIWP) dated August 9, 1990. Approval RIWP with comments.		

SCCC Response to USEPA CERCLA 104(e) Information Request
Attachment C
Schedule of Chromium Documents
Mar 1983 to July 2003

Date	Document Identification	PDF	To EPA
1990-09-25	<i>Modified Interim Remedial Measures Work Plan for Standard Chlorine NJDEP Site ID No. 116</i> (EFP Associates, June 15, 1990, rev. Sept 25, 1990).		
1990-10-01	Letter dated 10-01-1990 from CLH (Maxus) to SCCC – Cvr letter with attachment – Site 116 portion of Sept 1990 Draft RI Work Plan		
1990-10-26	Transmittal Letter from NJDEP to SCCC, with enclosed <i>Modified Interim Remedial Measures Work Plan for Standard Chlorine, NJDEP Site Identification No. 116</i> (EFP Associates, June 15, 1990, Revised September 25, 1990).		
1991-11-13	Letter dated Nov 13, 1990 from SCCC to NJDEP – SCCC Comments on Chromium IRM Workplan for Site 116.		
1991-01-15	Transmittal Letter from French & Parrello to HMDC for Site 116 Zoning Certificate for IRM Construction.		
1991-01-09	Drawing, "Concept Grading Plan (Phase I & II), Standard Chlorine NJDEP Site No. 116, Los 48-52, Block 287		
1991-01-09	Drawing Rev dated 1/9/91 to June/4/1990 "Generalized Site Plan", Standard Chlorine NJDEP Site No. 116, Tax Lot 48,49,50,51,52, Block 287 ((French & Parrello, 1/9/91).		
1991-01-14	Letter dated Jan 14, 1991 to Maxus re: Phase I and II Chromium IRMs - Maxus		
1991-01-16	Letter dated Jan 16, 1991 from HMDC to Maxus – Zoning Certificate ZC-91-027.		
1991-01-25	Letter dated Jan 25, 1991 from SCCC to Maxus – Chromium IRMs, allegation of buried drum – no drum present.		
1991-01-03	SCCC memo to file dated Jan 3, 1991– NJDOH Inquiry – Chromium		
1991-07-25	Transmittal letter dated July 25, 1991 from SCCC to Maxus re Remedial Investigation Soils Data (w/o attachment).		
1991-08-08	<i>Draft Interim Remedial Measures Work Plan for Standard chlorine NJDEP Site Identification No. 116, Phase III</i> (French & Parrello, Aug 8, 1991).		
1991-10-04	Letter dated 4 Oct 1991 from NJDOH to Cloroben re: NJDOH industrial hygiene sampling.		
1991-10-17	Letter dated Oct 17, 1991 from SCCC to Maxus re: Chromium IRMs		
1991-10-28	Letter dated 10-28-1991 from HMDC to Maxus – HDMC approval IRM Work Plan Zoning Certificate		
1992-01-06	Letter dated Jan 06 1992 from NJDEP to SCCC Re: Aug 1991 Draft SIWP (letter includes comments on chromium contamination).		
1992-02-29	Letter dated Feb 29, 1992 from NJDEP to SCCC re: Response to SCC's letter of Jan 23, 1992.		
1992-03-17	Letter dated March 17, 1992 from Lowenstein Sandler on behalf of SCCC to NJDEP re: NJDEPE Letter Dated February 29, 1992.		
1992-05-22	Response letter dated May 22 1992 from NJDEP to SCCC Re: Response to SCCC letter of March 17, 1992 prepared by Lowenstein Sandler et al regarding chromium		

SCCC Response to USEPA CERCLA 104(e) Information Request
Attachment C
Schedule of Chromium Documents
Mar 1983 to July 2003

Date	Document Identification	PDF	To EPA
	contamination.		
1992-06-17	SCCC to Maxus – Chromium delineation at SCCC Site		
1992-06-30	Maxus to SCCC – Response to SCCC letter dated 06-17-1992		
1992-07-10	SCCC Interoffice Memo re: NJDOH Chromium Health Screening		
1992-10-26	SCCC Interoffice Memo to All Kearny Personnel – re NJDOH Confidential Medical Screening (chromium), with attached NJDOH Oct 21, 1992 letter and chromium study consent sheet.		
1993-03-30	Letter dated Mar 30 1993 from NJDEP to SCCC re: Groundwater data and chromium slag fingerprint analysis for metals		

SCCC Response to USEPA 104(e) Information Request
Attachment D
Schedule of NJPDES Permit No. NJ0001856 Documents

Date	Document Identification	PDF	To EPA
1972-10-06	Water Utilization Flow Sheet dated Oct 6, 1972	X	
1974-02-25	Letter dated 25 Feb 1974 from USEPA to SCCC with attached Draft Permit and Public Notice	X	
1978-05-23	Letter dated 23 May 1978 from USEPA to SCCC re Proposed modification to NPDES Permit, with attachments	X	
1979-01-30	Letter dated 30 Jan 1979 from USEPA to SCCC re Proposed modification to NPDES Permit, w/o attachments	X	
1979-05-11	Letter dated 11 May 1979 from USEPA to SCCC - Confirmation of Receipt of NPDES renewal application	X	
1985-02-27	Letter dated 27 Feb 1985 from JRB Associates to SCCC -- Re Permit development	X	
1985-03-15	Letter dated 15 Mar 1985 from JRB Associates to SCCC -- Re Draft NJPDES Permit, w/o attachments	X	
1985-08-05	Letter dated 05 Aug 1985 from Lowenstein, on behalf of SCCC, to NJDEP-DWR Request for inspection of administrative record	X	
1985-08-14	Letter dated 14 Aug 1985 from Lowenstein to NJDEP-DWR Extension request	X	
1985-08-28	Letter from SCCC (Lowenstein) to NJDEP-DWR - Request for extension of comment period	X	
1985-09-05	Letter dated 05 Sept 1985 from SCCC to NJDEP-DWR - Cvr letter with attached SCCC Comments on Draft NJPDES Permit No. NJ0001956	X	
1985-09-??	Undated letter from NJDEP-DWR to SCCC - NJDEP Response to SCCC Sept 5, 1985 Comment Letter (with NJDEP Comments to USEPA)	X	
1985-12-12	Letter from NJDEP-DWR to SCCC - Cvr Ltr with attached Final NJPDES Permit No NJ0001856	X	
1985-12-26	Letter from SCCC to NJDEP-DWR - Clarification of proposed wastewater management	X	
1985	Undated 1985 NJPDES Permit Application Information	X	
1986-02-06	Letter from NJDEP-DWR to SCCC - NJDEP response to Jan 1 1986 permit modification request	X	

SCCC Response to USEPA 104(e) Information Request
Attachment D
Schedule of NJPDES Permit No. NJ0001856 Documents

Date	Document Identification	PDF	To EPA
1986-05-02	NJ0001856_DMR dated 02 May 1986 for 86-02-01 to 86-04-30, with comments		
1986-08-15	NJ0001856_DMR dated 15 Aug 1986 for 86-05-01 to 86-07-31		
1986-11-24	NJ0001856_DMR dated 24 Nov 1986 for 86-08-01 to 86-10-31		
1987-01-30	NJDEP Notice Dated 30 Jan 1987 - OAL Docket No EWR 00387-87 Notice of Filing of Contested Case	X	
1987-02-03	NJ0001856_DMR dated 03 Feb 1987 for 86-11-01 to 87-01-31		
1987-03-09	Letter from NJ Dept Law to OAL - SCCC OAL Docket EWR 00387-87 Confirmation of Prehearing Conference	X	
1987-03-16	Letter from NJDEP-DWR to SCCC - Compliance Evaluation Inspection on 02-10-1987	X	
1987-05-18	NJ0001856_DMR dated 1987-05-18 for 87-02-01 to 87-04-30	X	
1987-08-18	NJ0001856_DMR dated 18 Aug 1987 for 87-05-01 to 87-07-31	X	
1987-10-09	Letter from SCCC (Lowenstein) to NJDEP-BIWM, WQM - NJPDES NJ0001956, settlement of administrative adjudication, wo attachments	X	
1988-06-07	NJDEP-ORS to Lowenstein Sandler - OAL Dkt EWR 387-87, DEP Dkt 87-18	X	
1988-06-15	Letter from NJDEP-DWR to SCCC Report of 02-09-1988 Compliance Evaluation Inspection	X	
1988-07-21	Letter from SCCC to NJDEP-DWR - Sludge Quality Assurance Reporting Requirements	X	
1988-08-08	NJDEP Discharge Surveillance Report dated 08 Aug 1988 –	X	
1988-08-23	NJ0001856_DMR dated 25 Aug 1988 for 88-05-01 to 88-07-31, with comments	X	
1988-09-02	Letter dated 02 Sept 1989 from NJDEP-DWR to SCCC - Aug 8, 1988 Compliance Evaluation Inspection	X	
1988-11-22	NJ0001856_DMR dated 22 Nov 1988 for 88-08-01 to 88-10-31, with 11-22-88 transmittal letter	X	
1989-09-18	Letter dated 18 Sep 1989 from NJDEP-DWR to SCCC Report of 08-16-1988 Compliance Evaluation Inspection	X	
1990-08-03	Letter dated 03 Aug 1990 from SCCC to NJDEP-DWR Application for NJPDES-DSW Permit Renewal, with attachments	X	
1990-12-05	Letter dated 05 Dec 1990 from NJDEP-DWR to SCCC - Compliance Evaluation Inspection Sept 18, 1990	X	

SCCC Response to USEPA 104(e) Information Request
Attachment D
Schedule of NJPDES Permit No. NJ0001856 Documents

Date	Document Identification	PDF	To EPA
1990-12-31	Letter dated 31 Dec 1990 from SCCC to NJDEP-DWR Response to Dec 5, 1990 NJDEP letter	X	
1992-03-13	Letter dated 13 Mar 1992 from NJDEP to SCCC - Report of 01-15-1992 Compliance Evaluation Inspection	X	
1993-06-22	Letter dated 22 Jun 1993 from NJPDES Interim Inspection Report with attached NOV	X	
2000-07-07	Letter dated July 7, 2000 from ESI to HMDC - Notification of Septic Tank Abandonment	X	
2000-07-07	Letter dated July 7, 2000 from ESI to KMUA - Notification of Septic Tank Abandonment	X	
2000-07-20	Letter dated July 7, 2000 from ESI to NJDEP - NJPDES Permit NJ0001856	X	
2000-08-08	Letter dated Aug 8, 2000 from ESI to NJDEP - Notification of Sealing of Septic Lines	X	
2000-08-21	Letter dated Aug 21, 2000 from ESI to NJDEP -.Certification of Closure, Bldg No 1 Septic System.	X	

ATTACHMENT E
EXHIBIT 1-3 to EDISON/COOPER PRP REPORT
Edison/Emark Battery Manufacturing Facility (Block 287, Lot 50) Selected Blueprints and Drawings

Job	No	Date	Description	Bldg Nos. ¹	Notes
4499	1	10/11/1929	Plot Plan	Manufacturing Plant	
4499	2	10/1/1929	Foundation Plan	Bldg No. 2	
4499	3	10/1/1929	Foundation Details	Bldg No. 2	
4499	4	10/25/1929	Concrete Framing Plan	Bldg No. 2	
4499	5	12/4/1929	First Floor Plan	Bldg No. 2	
4499	6	11/14/1929	Mezzanine Floor Plan	Bldg No. 2	2
4499	7	9/30/1929	Elevations (North and South)	Bldg No. 2	3
4499	8	11/1/1929	Elevation (East)	Bldg No. 2	
4499	9	11/1/1929	Elevation (West)	Bldg No. 2	
4499	10	10/16/1929	Cross-Section (Section A-A)	Bldg No. 2	
4499	11	10/02/1929	Cross-Section (Sections B-B, F-F, Y-Y)	Bldg No. 2	
4499	12	10/9/1929	Cross-Section (Section C-C)	Bldg No. 2	
4499	13	8/9/1929	Cross-Section	Bldg No. 2	
4499	14	10/4/1929	Cross-Section (Section G-G)	Bldg No. 2	
4499	15	10/5/1929	Steel Framing Plan	Bldg No. 2	
4499	16	10/5/1929	Steel Framing Sections	Bldg No. 2	
4499	17	11/15/1929	Elevations of Interior Partitions	Bldg No. 2	
4499	18	9/3/1929	Casting Room Foundations	Bldg No. 2	
4499	19	9/9/1929	Preheater Pit	Bldg No. 2	
4499	20	8/17/1929	Foundation Details	Bldg No. 2	
4499	21	10/11/1929	Foundation & Floor Plan	Bldg No. 2	
4499	22	9/7/1929	Concrete Framing Plan	Bldg No. 3	
4499	23	9/13/1929	Elevations	Bldg No. 3	
4499	24	10/10/1929	Cross-Section	Bldg No. 3	
4499	25	10/11/1929	Steel Framing Plan	Bldg No. 3	
4499	31	11/7/1929	Foundation Plan	Bldg No. 1	
4499	32	9/6/1929	Floor Plans	Bldg No. 1	
4499	33	7/31/1929	Elevations	Bldg No. 1	
4499	34	9/3/1929	Cross-section	Bldg No. 1	

¹ For location of Buildings, see PRP Report, Figure 1. Note: The Building Nos. used in this Schedule and on the PRP Report Figures correspond with the following designations used on Edison facility blue prints and drawings:

Inventory ID	Edison Blueprint/Drawing ID
Bldg No. 1	Engineering Building
Bldg No. 2	Battery Building (a/k/a Battery Plant Building, Production Building)
Bldg No. 3	Service & Maintenance Building
Bldg No. 4	Boiler House (a/k/a Power House)

² Floor Plan shows location of the following departments: Plate Finishing Dept; Casting & Pasting Departments; Receiving Dept; Shipping Dept; Assembling Dept; Separating Dept; Forming Dept. Also shows lead storage area and locations of floor drains in Forming Dept, Casting & Pasting Dept; and Separator Dept.

³ Front of Bldg has Men's locker room; superintendent's office and control room; other end has Oxide Handling Dept and Case Storage. Note: two floor drains are shown in Oxide Handling Dept.

ATTACHMENT E
EXHIBIT 1-3 to EDISON/COOPER PRP REPORT
Edison/Emark Battery Manufacturing Facility (Block 287, Lot 50) Selected Blueprints and Drawings

Job	No	Date	Description	Bldg Nos. ¹	Notes
4499	35	11/7/1929	Concrete Framing	Bldg No. 1	
4499	41	9/26/1929	Foundation & Floor Plan	Bldg No. 4	
4499	42	8/5/1929	Elevations	Bldg No. 4	
4499	43	10/30/1929	Cross-Section	Bldg No. 4	
4499	44	10/10/1929	Framing Plan	Bldg No. 4	
4499	45	9/4/1929	Details	Bldg No. 4	
4499	46	8/11/1920	Details	Bldg No. 2	
4499	47	9/26/1929	Tunnel & Boiler Foundation	Bldg No. 2	
4499	49	9/25/1929	Pipe Tunnel Connecting Bldg. No. 1 & Bldg. No. 2	Bldg No. 4	
4499	53	10/15/1929	Plans & Elevations	Yard, Bldgs. No. 1 & 2	
4499	54	12/19/1929	Entrance Bridge	Switch House	
4499	55	10/3/1929	Foundation Plan of Stair Tower	Manufacturing Plant	
4499	58	9/19/1929	Mezzanine Slab Reinforcement	Bldg No. 2	
4499	59	10/4/1929	Steel details for addition to Mezzanine Floor	Bldg No. 2	
4499	60	10/2/1929	Revisions to Steel work at Job	Bldg No. 2	
4499	61	10/8/1929	Miscellaneous Steel Details	Bldg No. 2	
4499	62	12/26/1929	Plans & Elevations	Bldg No. 2	
4499	63	1/9/1930	Bridge	Gate House	
4499	63-A	1/11/1930	Revised Bridge Posts	Manufacturing Plant	
4499	101	4/10/1930	Plumbing (First Fl)	Manufacturing Plant	
4499	102	4/10/1930	Plumbing (Mezzanine)	Bldg No. 2	4
4499	104	Undated	Plumbing Details	Bldg No. 2	
4499	106	9/30/1929	Plumbing (Yard Connections)	Manufacturing Plant	5
4499	107	4/10/1930	Process Water Supply	Manufacturing Plant	6
4499	110	4/10/1930	Plumbing Plan	Bldg No. 2	
4499	112	9/30/1929	Laboratory Water Supply and Drains	Bldg No. 4	
4499	113	4/10/1930	Slots & Openings-Preheater Pit	Bldg No. 1	
4499	114	4/10/1930	Mezzanine Toilet Rooms	Bldg No. 2	
4499	117	4/15/1930	Process Water Supply & Waste-Separator Dept	Bldg No. 2	
4499	120	4/1/1930	Sprinkler - Yard Layout	Bldg No. 2	7
4499	121	4/1/1930	Sprinkler Plan	Manufacturing Plant	
4499	122	4/1/1930	Sprinkler Plan	Bldg No. 2	
4499	130	4/1/1930	Lighting Plan	Bldg Nos. 1, 3, and 4	
4499	131	10/9/1929	Lighting Plan	Bldg No. 2	
4499	132	9/24/1929	Transformer Room	Bldg Nos. 1, 3 and 4	
4499	139	4/7/1930	Soot Blower Piping and Instruments pipe sleeve	Bldg No. 2	
4499	140	4/1/1930	Steam Main - Yard Layout	Boilers	
4499	141	4/1/1930	Detail Plan - Steam	Main-Yard	8
				Main -Yard Layout	9

⁴ Shows location of and discharge route for all floor drains on 1st Floor of Bldg No. 2. Shows location of wood trench for Duriron & C. I. Process Drain. Shows manhole details.

⁵ Note says, "Standard details. To be followed where applicable."

⁶ Shows all lines and discharge routes, including 30" x 30" drainage ditch behind Bldg No. 4. This drawing is annotated to show changes in connections as of 2/28/30

⁷ Company identified as Emark Battery Corporation (as opposed to Thomas A Edison, Inc.)

⁸ Shows location of acid tank, piping from RR siding to acid tank. Also shows tunnels between Bldgs. No. 1 & No. 2, and between Bldgs. No. 4 and No. 2. Identifies tunnel as conduit for steam pipe from Bldg No. 4.

⁹ Shows tunnel details

ATTACHMENT E
EXHIBIT 1-3 to EDISON/COOPER PRP REPORT
Edison/Emark Battery Manufacturing Facility (Block 287, Lot 50) Selected Blueprints and Drawings

Job	No	Date	Description	Bldg Nos. ¹	Notes
4499	142	4/1/1930	Details – Steam	Main – Yard Layout	
4499	143	4/1/1930	Heating Plan	Bldg No. 2	
4499	144	11/5/1929	Heating Plan	Bldg No. 1	¹⁰
4499	145	4/1/1930	Heating Plan	Bldg No. 3	¹¹
4499	146	8/27/1929	Piping Details	Manufacturing Plant	
4499	147	4/15/1930	Steam and Compressor Air – Separator Dept		¹²
4499	160	4/1/1930	Equipment Section-AA	Bldg No. 2	
4499	161	4/1/1930	Equipment Section – CC (Sheet 5 and 143)	Bldg No. 2	
4499	162	9/19/1929	Equipment Sections	Bldg Nos. 1, 3, and 4	
4499	163	8/29/1929	Equipment Section – “DD”	Bldg No. 2	¹³
4499	170	4/1/1930	Location of Acid Storage Tank & Stack	Manufacturing Plant	¹⁴
4499	171	4/10/1930	Plan of Lead-Lined Acid System	Facility	¹⁵
4499	172	4/15/1930	Lead Lined Piping Connection bt tanks - Oxide & Forming Depts	Bldg No. 2	¹⁶
4499	180	4/7/1930	Plan of Steam & Exhaust	Bldg No. 4	
4499	181	4/7/1930	Plan of Boiler Feed & Blow Off	Bldg No. 4	
4499	182	4/7/1930	Front Elevations-Boilers	Bldg No. 4	
4499	183	4/7/1930	Side Elevation	Bldg No. 4	
4499	184	4/7/1930	Details of Piping	Bldg No. 4	
4499	186	4/7/1930	Boiler Breeching Inside building	Bldg No. 4	
4499	188	4/7/1930	Ventilating & Heating System – Separator Rm	Bldg No. 2	
4499	189	4/7/1930	Soot Blower Piping and Instrument Pipe Sleeve	Boilers	
4499	190	4/7/1930	Equipment Foundations	Bldg No. 4	
4499	191	4/7/1930	Compressor Foundations	Bldg No. 4	
4499	192	4/7/1930	Compressor Room	Bldg No. 4	
4499	193	4/7/1930	Compressor Foundation	Bldg No. 4	
1211	1	12/3/1929	Operating Platform-Oxide Dept	Bldg No. 2	
1211	2	12/29/1929	Work Bench Detail	Bldg No. 3	
1211	3	12/27/1929	Acid Tank Framing	Bldg No. 2	¹⁷
1211	4	12/28/1929	Acid Tank Framing (Tanks in Oxide Handling Dept)	Bldg No. 2	
1211	5	12/28/1929	Acid Tank Framing (Tanks in Forming Dept)	Bldg No. 2	
1211	6	12/28/1929	Acid Tank Framing (Tanks in Forming Dept)	Bldg No. 2	
1211	7	1/28/1930	Cross-Section, Plate Finishing Dept	Bldg No. 2	¹⁸
1253	1	3/14/1934	Pile Plan – Addition to Battery Bldg	Bldg No. 2	
1253	2	4/6/1934	Pile Plan – Oxide Recovery Platform		
1253	3	4/8/1934	Foundation Plan – Addition to Battery Bldg	Bldg No. 2	
1253	4	Undated	Plans and Elevations – Oxide Recovery Bldg	Bldg No. 2	

¹⁰ Floor Plans on this Blueprint identify the following areas in Bldg No. 1: On first floor- all offices & toilets & file and first aid rooms; on 2nd floor- Chemical laboratory; Engineering Dept; Test & Research Dept. There are two “Mercoid” units shown in the T & R Dept; and 4 “#201 Kroy Units” shown around the perimeter

¹¹ The Floor Plan on this blueprint identifies the following areas in Bldg No. 3: Pipe and tin shop; stock room; machine shop; tool room; carpenter shop; toilet & locker room

¹² Shows 5 tanks in Separator Dept.

¹³ Floor Plan shows “Oxide Handling Dept” on 2nd floor of Bldg No. 2

¹⁴ Blueprint shows 2 ½ in. lead-lined flanged acid line running from acid tank to boiler room. Tank is 28ft.in length. Weight is 15,000 lbs. Weight of contents is 120,000 lbs.

¹⁵ Shows system for transporting acid from RR siding to storage tank (lead-lined), and then to 1st and 2nd floors of Bldg No. 2 – all via lead-lined pipes. Some piping is underground. Note: Facility identified as “Emark Battery Corporation.”

¹⁶ Facility identified as “Emark Battery Corporation”

¹⁷ Plan shows 3 tanks in Oxide Handling Dept: two 600 gallon tanks, and one 200 gallon tank

¹⁸ Plan shows 2 ovens in dept. Total load is 30,000 lbs.

ATTACHMENT E
EXHIBIT 1-3 to EDISON/COOPER PRP REPORT
Edison/Emark Battery Manufacturing Facility (Block 287, Lot 50) Selected Blueprints and Drawings

Job	No	Date	Description	Bldg Nos. ¹	Notes
1253	5	5/23/1934	Equipment Plans – Addition to Battery Bldg	Bldg No. 2	
1253	6	4/9/1934	Floor Plans & Elevations – Addition to Battery Bldg	Bldg No. 2	
1253	7	4/23/1934	Sections & Details – Addition to Battery Bldg	Bldg No. 2	¹⁹
1253	8	4/9/1934	Steel Framing – Addition to Battery Bldg	Bldg No. 2	
1253	9	3/27/1934	Door Details – Addition to Battery Bldg	Bldg No. 2	
1253	10	4/23/1934	Steel Framing – 80 ft addition	Bldg No. 2	
1253	11	4/19/1934	Piling & Concrete – 80 ft addition	Bldg No. 2	

Ref. No	Drawing No	Date	By	Building ²⁰ /Location
	1742	9/14/1929	The Heine Company	Reinforced Concrete Chimney
9401-L-25		8/14/1929	E. Keeler Co.	Front Elevation 2 250-HP Water Tube Boilers
9402-L-25		8/14/1929	E. Keeler Co.	Side Elevation – 250-HP Water Tube Boiler
9402-L-25		8/14/1929	E. Keeler Co.	Foundation Plan 2 250-HP Water Tube Boilers
R3921	1		E & T Fairbanks & Coo	Equipment – Bldg. No.2
R3921	2		E & T Fairbanks & Co.	Equipment – Bldg. No. 2
6745	1		Globe Automatic Sprinkler	Sprinkler System
6745	2		Globe Automatic Sprinkler	Sprinkler System
6745	3		Globe Automatic Sprinkler	Sprinkler System
6745	4		Globe Automatic Sprinkler	Sprinkler System

Edison Engineering Dept Drawings and Blueprints

Ref No.	Date	Description	Location	Notes
0209-D	10/30/1931	Rearrangements for Wash-and Dress. Rooms	Bldg No. 2	
0600-F	11/12/1934	Layout showing deposit of Mud and Oxide	In rear of S & M	
0500-C		Receiving Platform	Bldg. No. 3	²¹
0600-E	9/13/1934	Auto Parking Layout	West of Bldg. No. 1	²²
0604	4/13/1936	Roadway & Drain, for Shipping	Bldg. No. 2	²³
A-50	9/21/1937	Layout of Scrap Melting Bldg ²⁴	Bldg. No. 2	
540	6/9/1949	Mezzanine to be erected in shipping room of production building	Bldg. No. 2	²⁵
C-537	11/7/1951	500 Gallon Hot Water Tank	Bldg. No. 2	²⁶

¹⁹ Shows floor drains.

²⁰ Buildings are identified by current designations. These correspond to the following Edison designations: Bldg. No. 1 = Engineering Bldg.; Bldg No. 2 = Battery Bldg; Bldg No. 3 = Service Bldg; Bldg No. 4 = Boiler House.

²¹ “All wood-work to be creosote treated”

²² Layout shows 79 parking spaces

²³ Drawing shows details of Catch Basins. Shows discharge to Meadows.

²⁴ This diagram shows modifications to addition to Bldg No. 2

²⁵ Thomas A. Edison, Inc., West Orange, N. J. – Automotive Division

²⁶ Legend: Thomas A. Edison, Inc. Automotive Division Plant No. 1, Kearny, NJ, Engineering Department

**STANDARD CHLORINE CHEMICAL CO., INC. (SCCC) SUPERFUND SITE
Lot 50**

**Identification of Additional Potentially Responsible Party (PRP)
Sybron Chemicals, Inc., as successor to Tanatex Chemical Corporation**

Identity of PRP: Sybron Chemicals, Inc., a Delaware corporation (Sybron), 200 Birmingham Road, PO Box 66, Birmingham, NJ 08011, as successor to Tanatex Chemical Corporation, a New Jersey corporation (Tanatex). As used herein, Sybron and Tanatex, collectively, (Sybron/Tanatex).

History of succession: In the 1960s, Tanatex, a NJ corporation, was acquired by the Sybron Corporation, a New York corporation (Sybron Corp), which operated Tanatex as a wholly-owned subsidiary until December 31, 1970 when Tanatex was merged into Sybron Corp. Between 1970 and 1987, Tanatex operated as Tanatex/Sybron, a division of Sybron Corp and part of the Sybron Chemical Group. In 1987, Sybron Chemical, Inc., a New Jersey corporation (Sybron NJ), acquired the Sybron Chemical Group, including Sybron/Tanatex, from Sybron Corp. In 1990, Sybron NJ was merged into a newly formed Delaware corporation also called Sybron Chemicals, Inc. (Sybron). In 2000, Bayer AG (Bayer), a German corporation, acquired the world-wide operations of Sybron/Tanatex.¹ Based on a review of environmental cases instituted after 2000, it is believed that Sybron retained liability for environmental contamination arising from some operations prior to the acquisition by Bayer, but that Bayer assumed liability from some operations.

Relationship of the Sybron/Tanatex to the SCCC Site: Operator, chemical (dye carrier) of a dye carrier manufacturing operation and a research laboratory for formulation of dye-carrier products on Block 287, Lot 50 between 1957 (or earlier) and October 1, 1963.

Overview of Tanatex's dye carrier operations: Between the mid-1950s and the last Quarter of 1963, Tanatex leased buildings and equipment on Lot 50 from the property's owners for use in a chemical manufacturing operation that produced dye carrier chemicals for the textile, paper and leather industries. In late 1963 or early 1964, Tanatex moved its operations to Lyndhurst, New Jersey. During its years of operation at the Site, Tanatex was the sole occupant of Building No. 3, which it used for its manufacturing operations.² It also may

¹ Bayer merged the textile auxiliary units of both Bayer and Sybron into its Textile Processing Chemicals (TPC) business unit of Bayer Chemicals AG. In 2004, Bayer Chemicals AG and a portion of Bayer's polymers business were spun off to form a new company, LANXESS AG. See www.lanxess.com for history after 2006.

² Lessees: Tanatex – Exception D to the 1959 deed by which Lot 50 was conveyed by Crown Rubber Products to Keaton Rubber, expressly references the "Rights of Tanatex Chemical Corp. by sundry leases." The 1962 Agreement for sale of Lot 50 between Keaton and SCCC references three leases (#1, #2, #3), and gives termination date of one of these as February 1964.

have leased some of Building No. 2 and Building No. 4 prior to SCCC's acquisition of the property in 1962. In its years of operation, Tanatex leased equipment from the Site's owners for use in its operations. It also had use of the 829 ft. long railroad side track located adjacent to Buildings 2 and 4 for transportation of materials to and from Lot 50.³

The principal raw material known to have been used by Tanatex in its dye carrier manufacturing operations was technical trichlorobenzene, a mixture composed primarily of 1,2,4-trichlorobenzene (1,2,4-TCB) and 1,2,3 trichlorobenzene (1,2,3-TCB). Although no records have been located which document the quantity of technical trichlorobenzene used by Tanatex in its operations on Lot 50, it is known that by the late 1960s, Tanatex represented 60% of the TCB dye carrier market, with annual purchases of approximately 3,000,000 lbs of technical trichlorobenzenes.⁴

Available formulations of technical trichlorobenzene from this period are known to have contained small amounts of dichlorobenzene isomers and higher chlorinated chlorobenzenes (i.e., tetrachlorobenzenes, pentachlorobenzenes and hexachlorobenzenes). As described more fully below, 2,3,7,8-TCDD is a known trace contaminant in formulations of technical trichlorobenzene from this period.

It is believed that Tanatex also used methylnaphthalenes⁵, alkylated naphthalenes, dichlorobenzenes, and biphenyl⁶ as well as various surfactants and solvents in its operations.

Discharges and/or spills from Tanatex's operations in Building No. 3 were conveyed via the floor drains in that building to the several discharge outlets near Buildings No. 3 and Building No 4.⁷

The chemical research laboratory operated by Tanatex was located on the 2nd floor of Building No. 1. During its tenure at the Site Tanatex applied for and obtained at least one patent a dye carrier for the dyeing of synthetic fabrics. The experiments undertaken in support of the 1961 application for this patent involved the use of the following chemicals: Pine Oil; oleic Acid; triethanolamine; naphthalene; 1-methylnaphthalene; 2-methylnaphthalene; tri-methylnaphthalene; di-methylnaphthalene; phenol; xylene; toluene; and sulfated butyl oleate. The several chemical compositions claimed in this patent all involved substances composed of 70% to 98% methylnaphthalenes.

³ By agreement dated July 23, 1957 among the Erie Railroad, Keaton Rubber Co., and Tanatex Chemical Corporation, Tanatex was given the right to use and be served by a 829 ft. long side track. Effective December 10, 1962, this agreement was assigned by Keaton to SCCC in connection with the sale of Lot 50 from Keaton to SCCC.

⁴ Information is from a 1970 proprietary study. Publication is prohibited without prior approval from author.

⁵ A 1961 Tanatex dye-carrier formulation patent application involved various chemical compositions composed of 70%-98% methylnaphthalenes.

⁶ Sybron/Tanatex is known to have manufactured biphenyl at its operations in Lyndhurst, NJ. It is possible these operations were also conducted at the Kearny facility.

⁷ See PRP Report on Edison-Cooper Industries for a full description of discharge piping and outlets.

SCCC Site Contaminants Attributable to Tanatex Operations:

- **1,2,4-TCB:** Analytic data from various sampling events at locations on or near Lot 50 show significantly elevated concentrations of 1,2,4 TCB in surface water, sediment and ground water samples reasonably attributable to activities conducted on Lot 50. As stated above, the principal chemical material used in the dye-carrier formulations manufactured by Tanatex in Building No. 3, was technical trichlorobenzene, a mixture of isomers of trichlorobenzene that typically contained approx. 60-70% 1,2,4-trichlorobenzene (1,2,4-TCB). Tanatex is the only entity which transported, stored and used trichlorobenzenes on Lot 50.⁸ Contamination of the various referenced media would have occurred through the routine discharge of effluent from Building No. 3 and also, perhaps, as a result of transportation and/or storage accidents and spills.
- **Dichlorobenzenes and monochlorobenzene:** These lower chlorinated chlorobenzenes have also been found in sediment, surface water and groundwater samples associated with manufacturing operations conducted on Lot 50. Tanatex operations may have been one source of these contaminants in the sampling locations associated with discharge points and pathways from Building No. 3, as these lower chlorinated chlorobenzenes were present in the technical trichlorobenzene used by Tanatex.⁹ Additionally, in surface water, soil and sediment samples, these lower chlorinated chlorobenzenes may be present as degradation products from the reduction of technical trichlorobenzene over time.
- **Naphthalene derivatives:** Elevated concentrations of naphthalene derivatives have been found in various samples taken at locations associated with manufacturing operations conducted on Lot 50. Only Tanatex operated a chemical manufacturing facility on Lot 50 that is known to have produced naphthalene-related products (specifically dye-carriers).
- **2,3,7,8-TCDD:** 2,3,7,8-TCDD has been discovered in surface water and sediments along the discharge pathways from the Tanatex operations conducted on Lot 50. The attached 2,3,7,8-TCDD data maps showing the analytic results of 2,3,7,8-TCDD sampling show as strong correlation between manufacturing activities on Lot 50 and the presence of 2,3,7,8 TCDD in pathways leading from that manufacturing area. The technical trichlorobenzenes used by Tanatex in the late 1950s early 1960s typically contained small quantities of the higher-chlorinated chlorobenzenes isomers with 2,3,7,8-TCDD present as a contaminant. The effluent discharges and inadvertent spills and releases of technical trichlorobenzene by Tanatex during the course of its operations are the likely sources of this

⁸ SCCC separated trichlorobenzene isomers on Lot 49 of the Site during the 1970s. However, the trichlorobenzenes used by SCCC never left Lot 49 (and the rail line adjacent to it). They were transported via rail directly to Lot 49, stored and separated on Lot 49 and shipped via rail from Lot 49.

⁹ SCCC dichlorobenzene operations on Lot 50 have previously been identified as another source of these contaminants.

2,3,7,8-TCDD contamination.¹⁰ As stated above, Tanatex is the only entity known to have used trichlorobenzenes in manufacturing activities conducted on Lot 50.

¹⁰ Note: The distillation pot located in the still Building on Lot 49 (in the northeastern section of the SCCC Site) was used for naphthalene refining and separation of trichlorobenzene isomers and has been identified as a possible 2,3,7,8 TCDD source. However, none of the materials used, produced or stored in connection with these operations were ever transported beyond the distillation manufacturing area.

STANDARD CHLORINE CHEMICAL CO., INC. (SCCC) SUPERFUND SITE

Block 287, Lot 50

**Preliminary Identification of Additional Potentially Responsible Party (PRP):
Crown Rubber Products (Crown Rubber)**

Identity of PRP:

- Name: The Crown Rubber Company
- Statue of Incorporation: New Jersey
- Current status: Believed defunct.

Relationship of Crown Rubber to the SCCC Site: Crown Rubber acquired Lot 50 from Thomas A Edison, Inc. in January, 1954 for use as a manufacturing facility for production of molded rubber products. Crown Rubber sold the property to Keaton Rubber in May, 1959. Crown Rubber apparently only used 40,000 sq. feet of the facility in its operations, and rented out the remainder of the plant (and related equipment).¹ No leases have been found. However, available documentation relating to a Side Track Agreement for use of the rail spur running adjacent to Bldg. No. 2 and Bldg. No. 3, indicates that Crown Rubber entered into a three-party agreement among itself, the railroad and Tanatex Chemical Corporation (Tanatex) no later than mid-1957. Later documentation shows that Tanatex definitely used Bldg No. 3 and a portion of Bldg No. 4 in its operations on Lot 50. One can therefore infer that Crown Rubber probably used some or all of Bldg No. 2 and some of Bldg. No. 1 in its manufacture of molded rubber products.

Nature of Operations, etc.: No site-specific documentation is available to identify the exact nature of Crown Rubber's molded rubber product manufacturing operations or the contaminants related to those operations. It must, however, be assumed that its operations involved materials, processes, and wastes typical of other manufacturers of molded rubber products. Note: prior to its move to Kearny, Crown Rubber operated a similar, but smaller operation, on Adams Street in Newark, New Jersey. It is not known if there is any information available about operations at that location.

¹ See attached article, "Rubber Fabricator Buys Kearny Plant," The New York Times, Jan. 22, 1954 (www.NYTimes.com ,NYT online archives).

STANDARD CHLORINE CHEMICAL CO., INC. (SCCC) SUPERFUND SITE
Block 287, Lot 50
Preliminary Identification of Additional Potentially Responsible Party (PRP):
Keaton Rubber Co. (Keaton)

EXHIBIT 1

Property Records, etc.

RUBBER FABRICATOR BUYS KEARNY PLANT

The Crown Rubber Company, manufacturer of moulded rubber products, has purchased the battery manufacturing plant of the Thomas A. Edison Company on the Belleville Turnpike in Kearny, N. J. The sale was made through J. I. Kislak, Inc., as broker.

The property comprises several buildings of one and two stories on a tract of nine and one-half acres. The buildings, containing 60,000 square feet of space, were erected by the Edison company in 1930 and were used for the manufacture of automobile storage batteries. This work has been discontinued and the Edison company plans to complete its removal from the plant by the end of this month.

The rubber company, now on Adams Street in Newark, plans to occupy about 40,000 square feet in the property and will lease the remainder of the space. This is an expansion move for the company which will occupy about twice the space it now uses.

The New York Times

Published: January 22, 1954

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ATTACHMENT E
EXHIBIT 1-3 to EDISON/COOPER PRP REPORT
Edison/Emark Battery Manufacturing Facility (Block 287, Lot 50) Selected Blueprints and Drawings

Job	No	Date	Description	Bldg Nos. ¹	Notes
4499	1	10/11/1929	Plot Plan	Manufacturing Plant	
4499	2	10/1/1929	Foundation Plan	Bldg No. 2	
4499	3	10/1/1929	Foundation Details	Bldg No. 2	
4499	4	10/25/1929	Concrete Framing Plan	Bldg No. 2	
4499	5	12/4/1929	First Floor Plan	Bldg No. 2	²
4499	6	11/14/1929	Mezzanine Floor Plan	Bldg No. 2	³
4499	7	9/30/1929	Elevations (North and South)	Bldg No. 2	
4499	8	11/1/1929	Elevation (East)	Bldg No. 2	
4499	9	11/1/1929	Elevation (West)	Bldg No. 2	
4499	10	10/16/1929	Cross-Section (Section A-A)	Bldg No. 2	
4499	11	10/02/1929	Cross-Section (Sections B-B, F-F, Y-Y)	Bldg No. 2	
4499	12	10/9/1929	Cross-Section (Section C-C)	Bldg No. 2	
4499	13	8/9/1929	Cross-Section	Bldg No. 2	
4499	14	10/4/1929	Cross-Section (Section G-G)	Bldg No. 2	
4499	15	10/5/1929	Steel Framing Plan	Bldg No. 2	
4499	16	10/5/1929	Steel Framing Sections	Bldg No. 2	
4499	17	11/15/1929	Elevations of Interior Partitions	Bldg No. 2	
4499	18	9/3/1929	Casting Room Foundations	Bldg No. 2	
4499	19	9/9/1929	Preheater Pit	Bldg No. 2	
4499	20	8/17/1929	Foundation Details	Bldg No. 2	
4499	21	10/11/1929	Foundation & Floor Plan	Bldg No. 3	
4499	22	9/7/1929	Concrete Framing Plan	Bldg No. 3	
4499	23	9/13/1929	Elevations	Bldg No. 3	
4499	24	10/10/1929	Cross-Section	Bldg No. 3	
4499	25	10/11/1929	Steel Framing Plan	Bldg No. 3	
4499	31	11/7/1929	Foundation Plan	Bldg No. 1	
4499	32	9/6/1929	Floor Plans	Bldg No. 1	
4499	33	7/31/1929	Elevations	Bldg No. 1	
4499	34	9/3/1929	Cross-section	Bldg No. 1	

¹ For location of Buildings, see PRP Report, Figure 1. Note: The Building Nos. used in this Schedule and on the PRP Report Figures correspond with the following designations used on Edison facility blue prints and drawings:

Inventory ID	Edison Blueprint/Drawing ID
Bldg No. 1	Engineering Building
Bldg No. 2	Battery Building (a/k/a Battery Plant Building, Production Building)
Bldg No. 3	Service & Maintenance Building
Bldg No. 4	Boiler House (a/k/a Power House)

² Floor Plan shows location of the following departments: Plate Finishing Dept; Casting & Pasting Departments; Receiving Dept; Shipping Dept; Assembling Dept; Separating Dept; Forming Dept. Also shows lead storage area and locations of floor drains in Forming Dept, Casting & Pasting Dept; and Separator Dept.

³ Front of Bldg has Men's locker room; superintendant's office and control room; other end has Oxide Handling Dept and Case Storage. Note: two floor drains are shown in Oxide Handling Dept.

ATTACHMENT E
EXHIBIT 1-3 to EDISON/COOPER PRP REPORT
Edison/Emark Battery Manufacturing Facility (Block 287, Lot 50) Selected Blueprints and Drawings

Job	No	Date	Description	Bldg Nos.¹	Notes
4499	35	11/7/1929	Concrete Framing	Bldg No. 1	
4499	41	9/26/1929	Foundation & Floor Plan	Bldg No. 4	
4499	42	8/5/1929	Elevations	Bldg No. 4	
4499	43	10/30/1929	Cross-Section	Bldg No. 4	
4499	44	10/10/1929	Framing Plan	Bldg No. 4	
4499	45	9/4/1929	Details	Bldg No. 2	
4499	46	8/11/1920	Details	Bldg No. 2	
4499	47	9/26/1929	Tunnel & Boiler Foundation	Bldg No. 4	
4499	49	9/25/1929	Pipe Tunnel Connecting Bldg. No. 1 & Bldg. No. 2	Yard, Bldgs. No. 1 & 2	
4499	53	10/15/1929	Plans & Elevations	Switch House	
4499	54	12/19/1929	Entrance Bridge	Manufacturing Plant	
4499	55	10/3/1929	Foundation Plan of Stair Tower	Bldg No. 2	
4499	58	9/19/1929	Mezzanine Slab Reinforcement	Bldg No. 2	
4499	59	10/4/1929	Steel details for addition to Mezzanine Floor	Bldg No. 2	
4499	60	10/2/1929	Revisions to Steel work at Job	Bldg No. 2	
4499	61	10/8/1929	Miscellaneous Steel Details	Bldg No. 2	
4499	62	12/26/1929	Plans & Elevations	Gate House	
4499	63	1/9/1930	Bridge	Manufacturing Plant	
4499	63-A	1/11/1930	Revised Bridge Posts	Manufacturing Plant	
4499	101	4/10/1930	Plumbing (First Fl)	Bldg No. 2	⁴
4499	102	4/10/1930	Plumbing (Mezzanine)	Bldg No. 2	
4499	104	Undated	Plumbing Details	Manufacturing Plant	⁵
4499	106	9/30/1929	Plumbing (Yard Connections)	Manufacturing Plant	⁶
4499	107	4/10/1930	Process Water Supply	Bldg No. 2	
4499	110	4/10/1930	Plumbing Plan	Bldg No. 4	
4499	112	9/30/1929	Laboratory Water Supply and Drains	Bldg No. 1	
4499	113	4/10/1930	Slots & Openings-Preheater Pit	Bldg No. 2	
4499	114	4/10/1930	Mezzanine Toilet Rooms	Bldg No. 2	
4499	117	4/15/1930	Process Water Supply & Waste-Separator Dept	Bldg No. 2	⁷
4499	120	4/1/1930	Sprinkler – Yard Layout	Manufacturing Plant	
4499	121	4/1/1930	Sprinkler Plan	Bldg No. 2	
4499	122	4/1/1930	Sprinkler Plan	Bldg Nos. 1, 3, and 4	
4499	130	4/1/1930	Lighting Plan	Bldg No. 2	
4499	131	10/9/1929	Lighting Plan	Bldg Nos. 1, 3 and 4	
4499	132	9/24/1929	Transformer Room	Bldg No. 2	
4499	139	4/7/1930	Soot Blower Piping and Instruments pipe sleeve	Boilers	
4499	140	4/1/1930	Steam Main – Yard Layout	Main-Yard	⁸
4499	141	4/1/1930	Detail Plan – Steam	Main –Yard Layout	⁹

⁴ Shows location of and discharge route for all floor drains on 1st Floor of Bldg No. 2. Shows location of wood trench for Duriron & C. I. Process Drain. Shows manhole details.

⁵ Note says, “Standard details. To be followed where applicable.”

⁶ Shows all lines and discharge routes, including 30” x 30” drainage ditch behind Bldg No. 4. This drawing is annotated to show changes in connections as of 2/28/30

⁷ Company identified as Emark Battery Corporation (as opposed to Thomas A Edison, Inc.)

⁸ Shows location of acid tank, piping from RR siding to acid tank. Also shows tunnels between Bldgs. No. 1 & No. 2, and between Bldgs. No. 4 and No. 2. Identifies tunnel as conduit for steam pipe from Bldg No. 4.

⁹ Shows tunnel details

ATTACHMENT E
EXHIBIT 1-3 to EDISON/COOPER PRP REPORT
Edison/Emark Battery Manufacturing Facility (Block 287, Lot 50) Selected Blueprints and Drawings

Job	No	Date	Description	Bldg Nos. ¹	Notes
4499	142	4/1/1930	Details – Steam	Main – Yard Layout	
4499	143	4/1/1930	Heating Plan	Bldg No. 2	
4499	144	11/5/1929	Heating Plan	Bldg No. 1	¹⁰
4499	145	4/1/1930	Heating Plan	Bldg No. 3	¹¹
4499	146	8/27/1929	Piping Details	Manufacturing Plant	
4499	147	4/15/1930	Steam and Compressor Air – Separator Dept		¹²
4499	160	4/1/1930	Equipment Section-AA	Bldg No. 2	
4499	161	4/1/1930	Equipment Section – CC (Sheet 5 and 143)	Bldg No. 2	
4499	162	9/19/1929	Equipment Sections	Bldg Nos. 1, 3, and 4	
4499	163	8/29/1929	Equipment Section – “DD”	Bldg No. 2	¹³
4499	170	4/1/1930	Location of Acid Storage Tank & Stack	Manufacturing Plant	¹⁴
4499	171	4/10/1930	Plan of Lead-Lined Acid System	Facility	¹⁵
4499	172	4/15/1930	Lead Lined Piping Connection bt tanks - Oxide & Forming Depts	Bldg No. 2	¹⁶
4499	180	4/7/1930	Plan of Steam & Exhaust	Bldg No. 4	
4499	181	4/7/1930	Plan of Boiler Feed & Blow Off	Bldg No. 4	
4499	182	4/7/1930	Front Elevations-Boilers	Bldg No. 4	
4499	183	4/7/1930	Side Elevation	Bldg No. 4	
4499	184	4/7/1930	Details of Piping	Bldg No. 4	
4499	186	4/7/1930	Boiler Breeching Inside building	Bldg No. 4	
4499	188	4/7/1930	Ventilating & Heating System – Separator Rm	Bldg No. 2	
4499	189	4/7/1930	Soot Blower Piping and Instrument Pipe Sleeve	Boilers	
4499	190	4/7/1930	Equipment Foundations	Bldg No. 4	
4499	191	4/7/1930	Compressor Foundations	Bldg No. 4	
4499	192	4/7/1930	Compressor Room	Bldg No. 4	
4499	193	4/7/1930	Compressor Foundation	Bldg No. 4	
1211	1	12/3/1929	Operating Platform-Oxide Dept	Bldg No. 2	
1211	2	12/29/1929	Work Bench Detail	Bldg No. 3	
1211	3	12/27/1929	Acid Tank Framing	Bldg No. 2	¹⁷
1211	4	12/28/1929	Acid Tank Framing (Tanks in Oxide Handling Dept)	Bldg No. 2	
1211	5	12/28/1929	Acid Tank Framing (Tanks in Forming Dept)	Bldg No. 2	
1211	6	12/28/1929	Acid Tank Framing (Tanks in Forming Dept)	Bldg No. 2	
1211	7	1/28/1930	Cross-Section, Plate Finishing Dept	Bldg No. 2	¹⁸
1253	1	3/14/1934	Pile Plan – Addition to Battery Bldg	Bldg No. 2	
1253	2	4/6/1934	Pile Plan – Oxide Recovery Platform		
1253	3	4/8/1934	Foundation Plan – Addition to Battery Bldg	Bldg No. 2	
1253	4	Undated	Plans and Elevations – Oxide Recovery Bldg	Bldg No. 2	

¹⁰ Floor Plans on this Blueprint identify the following areas in Bldg No. 1: On first floor- all offices & toilets & file and first aid rooms; on 2nd floor- Chemical laboratory; Engineering Dept; Test & Research Dept. There are two “Mercoird” units shown in the T & R Dept; and 4 “#201 Kroy Units” shown around the perimeter

¹¹ The Floor Plan on this blueprint identifies the following areas in Bldg No. 3: Pipe and tin shop; stock room; machine shop; tool room; carpenter shop; toilet & locker room

¹² Shows 5 tanks in Separator Dept.

¹³ Floor Plan shows “Oxide Handling Dept” on 2nd floor of Bldg No. 2

¹⁴ Blueprint shows 2 ½ in. lead-lined flanged acid line running from acid tank to boiler room. Tank is 28ft.in length. Weight is 15,000 lbs. Weight of contents is 120,000 lbs.

¹⁵ Shows system for transporting acid from RR siding to storage tank (lead-lined), and then to 1st and 2nd floors of Bldg No. 2 – all via lead-lined pipes. Some piping is underground. Note: Facility identified as “Emark Battery Corporation.”

¹⁶ Facility identified as “Emark Battery Corporation”

¹⁷ Plan shows 3 tanks in Oxide Handling Dept: two 600 gallon tanks, and one 200 gallon tank

¹⁸ Plan shows 2 ovens in dept. Total load is 30,000 lbs.

ATTACHMENT E
EXHIBIT 1-3 to EDISON/COOPER PRP REPORT
Edison/Emark Battery Manufacturing Facility (Block 287, Lot 50) Selected Blueprints and Drawings

Job	No	Date	Description	Bldg Nos. ¹	Notes
1253	5	5/23/1934	Equipment Plans – Addition to Battery Bldg	Bldg No. 2	
1253	6	4/9/1934	Floor Plans & Elevations – Addition to Battery Bldg	Bldg No. 2	
1253	7	4/23/1934	Sections & Details – Addition to Battery Bldg	Bldg No. 2	¹⁹
1253	8	4/9/1934	Steel Framing – Addition to Battery Bldg	Bldg No. 2	
1253	9	3/27/1934	Door Details – Addition to Battery Bldg	Bldg No. 2	
1253	10	4/23/1934	Steel Framing – 80 ft addition	Bldg No. 2	
1253	11	4/19/1934	Piling & Concrete – 80 ft addition	Bldg No. 2	

Ref. No	Drawing No	Date	By	Building ²⁰ /Location
	1742	9/14/1929	The Heine Company	Reinforced Concrete Chimney
9401-L-25		8/14/1929	E. Keeler Co.	Front Elevation 2 250-HP Water Tube Boilers
9402-L-25		8/14/1929	E. Keeler Co.	Side Elevation – 250-HP Water Tube Boiler
9402-L-25		8/14/1929	E. Keeler Co.	Foundation Plan 2 250-HP Water Tube Boilers
R3921	1		E & T Fairbanks & Coo	Equipment – Bldg. No.2
R3921	2		E & T Fairbanks & Co.	Equipment – Bldg. No. 2
6745	1		Globe Automatic Sprinkler	Sprinkler System
6745	2		Globe Automatic Sprinkler	Sprinkler System
6745	3		Globe Automatic Sprinkler	Sprinkler System
6745	4		Globe Automatic Sprinkler	Sprinkler System

Edison Engineering Dept Drawings and Blueprints

Ref No.	Date	Description	Location	Notes
0209-D	10/30/1931	Rearrangements for Wash-and Dress. Rooms	Bldg No. 2	
0600-F	11/12/1934	Layout showing deposit of Mud and Oxide	In rear of S & M	
0500-C		Receiving Platform	Bldg. No. 3	²¹
0600-E	9/13/1934	Auto Parking Layout	West of Bldg. No. 1	²²
0604	4/13/1936	Roadway & Drain, for Shipping	Bldg. No. 2	²³
A-50	9/21/1937	Layout of Scrap Melting Bldg ²⁴	Bldg. No. 2	
540	6/9/1949	Mezzanine to be erected in shipping room of production building	Bldg. No. 2	²⁵
C-537	11/7/1951	500 Gallon Hot Water Tank	Bldg. No. 2	²⁶

¹⁹ Shows floor drains.

²⁰ Buildings are identified by current designations. These correspond to the following Edison designations: Bldg. No. 1 = Engineering Bldg.; Bldg No. 2 = Battery Bldg; Bldg No. 3 = Service Bldg; Bldg No. 4 = Boiler House.

²¹ “All wood-work to be creosote treated”

²² Layout shows 79 parking spaces

²³ Drawing shows details of Catch Basins. Shows discharge to Meadows.

²⁴ This diagram shows modifications to addition to Bldg No. 2

²⁵ Thomas A. Edison, Inc., West Orange, N. J. – Automotive Division

²⁶ Legend: Thomas A. Edison, Inc. Automotive Division Plant No. 1, Kearny, NJ, Engineering Department

STANDARD CHLORINE CHEMICAL CO., INC. (SCCC) SUPERFUND SITE
Block 287, Lot 50
Preliminary Identification of Additional Potentially Responsible Party (PRP):
Keaton Rubber Co. (Keaton)

EXHIBIT 1

Property Records, etc.

Erie-Lackawanna Railroad Company



free:
Kearny Op.
St. E.
RR

J. R. EBERT
SUPERINTENDENT

April 19, 1963
File 349.1

ERIE-LACKAWANNA TERMINAL
HOBOKEN, N. J.

JK
Standard Chlorine Chemical Company, Inc.
Jacobus Avenue
South Kearny, N. J.

✓ Attn. Mr. H. Everett Smith
Executive Vice President

Keaton Rubber Co.
Belleville Turnpike
Kearny, N. J.

Attn. Mr. M. Rogow, President

Gentlemen:

Herewith for each of your records, fully-executed duplicate original of assignment-consent dated December 11, 1962 whereby the rights and interest of Keaton Rubber Co. under agreement of July 23, 1957, with Erie R. R. Co. covering sidetrack 829 feet long and tripartite agreement of same date by which service was extended to Tanatex Chemical Corp. were transferred to Standard Chlorine Chemical Company, Inc.

Will you kindly acknowledge receipt?

Yours very truly,

RECEIVED
APR 22 1963


J. R. Ebert *afm*
Superintendent

The Friendly Service Route

KNOW ALL MEN BY THESE PRESENTS, that WHEREAS, ERIE RAILROAD COMPANY and KEATON RUBBER CO., entered into an agreement dated July 23rd, 1957, covering the ownership, operation, maintenance and use of a sidetrack 829 feet long, situated in the Town of Kearny, County of Hudson, State of New Jersey; and

WHEREAS, by another agreement dated July 23rd, 1957 made between ERIE RAILROAD COMPANY, KEATON RUBBER CO. and TANATEX CHEMICAL CORPORATION, the latter was given the right to use and to be served by said sidetrack; and

WHEREAS, ERIE-LACKAWANNA RAILROAD COMPANY has succeeded to the interest of ERIE RAILROAD COMPANY under said agreements.

NOW, THEREFORE, in consideration of the covenants herein contained and of One Dollar (\$1.00) paid by STANDARD CHLORINE CHEMICAL CO., INC. to said KEATON RUBBER CO. the receipt whereof is hereby acknowledged, the said KEATON RUBBER CO. does hereby transfer and assign unto the said STANDARD CHLORINE CHEMICAL CO., INC. a corporation of the State of New Jersey, with principal office at 115 Jacobus Avenue, Kearny, N. J., its successors and assigns, all the right, title and interest of said KEATON RUBBER CO. in, to and under the said agreements dated July 23rd, 1957, and in and to the sidetrack described in the first aforementioned agreement and in consideration of this assignment and of the annexed consent of ERIE-LACKAWANNA RAILROAD COMPANY said STANDARD CHLORINE CHEMICAL CO., INC. hereby assumes all of the covenants, provisions and conditions of said agreements as fully and to the same extent as if it had been originally named the Industry therein in place and stead of said KEATON RUBBER CO. and agrees to be bound by and to perform, fulfill and carry out all of the covenants, provisions and conditions to be performed, fulfilled and carried out by the Industry under said agreements.

IN WITNESS WHEREOF, the parties hereto have caused these presents to be executed by their proper officers on the 11th day of December, 1962.

Witness:

Raymond Regan

KEATON RUBBER CO.

By *Michael Regan*
President

Witness:

H. Smith

STANDARD CHLORINE CHEMICAL CO., INC.

By *William M. Smith*
President

ERIE-LACKAWANNA RAILROAD COMPANY, hereby consents to the foregoing assignment from KEATON RUBBER CO. to STANDARD CHLORINE CHEMICAL CO., INC. of the above described agreements dated July 23rd, 1957, and in consideration of such consent, the said STANDARD CHLORINE CHEMICAL CO., INC. hereby assumes all of the covenants, provisions and conditions of said agreements as fully and to the same extent as if it had been originally named the Industry in said agreements in place and stead of said KEATON RUBBER CO. and agrees to be bound by and to perform fulfill and carry out all of the covenants and provisions undertaken or to be performed by the Industry under said agreements.

It is understood and agreed that said KEATON RUBBER CO. is released of any obligation or responsibility under said agreements dated July 23rd, 1957 from and after December 10, 1962.

IN WITNESS WHEREOF, the parties hereto have caused this instrument to be executed by their proper officers this 11th day of December, 1962.

9RE
Witness:

E. H. McPhee

ERIE-LACKAWANNA RAILROAD COMPANY

By L. C. White
Vice President

Witness:

H. Hunt

STANDARD CHLORINE CHEMICAL CO., INC.

By Graham Hunt
President

Doc. Stamp

\$ 112
Assessors 2

This Indenture,

Made the 17th day of October, in the year of our Lord
One Thousand Nine Hundred and Sixty-two,

Between **KEATON RUBBER CO.,** a New Jersey corporation,

In the Town of Kearny County of Hudson
and State of New Jersey, party of the first part;

And **STANDARD CHLORINE CHEMICAL CO., INC.,** a New Jersey corporation,

In the Town of Kearny County of Hudson
and State of New Jersey, party of the second part;

1435
Witnesseth, That the said party of the first part, for and in consideration of the sum of
One (\$1.00) Dollar and other good and valuable considerations
lawful money of the United States of America, to it in hand well and truly paid by the said
party of the second part, at or before the sealing and delivery of these presents, the receipt whereof is
hereby acknowledged, and the said party of the first part being therewith fully satisfied, contented and
paid, has given, granted, bargained, sold, aliened, released, enfeoffed, conveyed and confirmed and by
these presents does give, grant, bargain, sell, alien, release, enfeoff, convey and confirm unto the said
party of the second part, and to its successors
and assigns, forever,

All those certain
tracts or parcels of land and premises, hereinafter particularly described, situate, lying and being
in the Town of Kearny County of Hudson
and State of New Jersey:

*
FIRST PARCEL: BEGINNING at a point formed by intersecting the northeasterly
property line of lands lying on the northeasterly side of
Belleville Turnpike with the southerly boundary of land conveyed to The
White Tar Co., of N.J., Inc., by deed dated October 4, 1916, recorded in
Deed Book 1238, page 408, in the Register's Office of Hudson County, N.J.,
running thence (1) along said boundary line N. 58° 22' 30" E. 32.77';
thence (2) still along the same parallel with the center line of lands of
the Pennsylvania Railroad Company and distant 870 feet southerly therefrom,
N. 74° 15' E. 1039.47' to the northwesterly corner of lands conveyed to the
Koppers Co., Inc., by Thomas A. Edison, Incorporated by deed dated November
18, 1946; thence (3) along the westerly line of land so conveyed, S. 15°
45' E. 400' to the southerly line of land conveyed to Thomas A. Edison by
James H. Rhodes and Co., by deed dated July 29, 1918 and recorded in Deed
Book 1288 on page 299 in the office of the Register of Hudson County;
thence (4) along the same parallel with the second described course, S. 74°
15' W. 638.19' to the northerly side line of the Old Newark Branch of the
Erie Railroad; thence (5) along the same N. 71° 48' W. 479.95' to the north-
easterly property line of lands lying on the northeasterly side of Belle-
ville Turnpike; and running thence (6) along the said property line N. 31°
37' 30" W. 127.91' to the place and point of BEGINNING. X

SECOND PARCEL: BEGINNING at a point formed by intersecting the northeasterly
property line of lands lying on the northeasterly side of
Belleville Turnpike with the southerly boundary line of land conveyed to
Thomas A. Edison by James H. Rhodes and Co., by deed dated July 29, 1918, and

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recorded in Book 1288 of Deeds on page 299 in the office of the Register of Hudson County; running thence (1) along said southerly boundary line, N.74° 15' E.203.72' to a point in the southerly side line of the Old Newark Branch of the Erie Railroad; thence (2) along the same N. 71° 48' W.303.77' to the northeasterly property line of lands lying on the northeasterly side line of Belleville Turnpike; and running thence (3) along said line S. 31° 37' 30" E. 176.37' to the point and place of BEGINNING.

The foregoing descriptions being in accordance with a survey made by Borrie & McDonald, Surveyors, December 16, 1961.

Being the same premises conveyed to Keaton Rubber Co., by Crown Rubber Products, Inc., a N.J. corporation, by deed dated September 1, 1959, recorded in the Register's office of Hudson County in Book 2822 of Deeds for said County on page 140, it being intended to convey hereby all the rights and property acquired by said deed.

The following lands and premises are expressly subject to the following:

A. The estate and rights in and about a strip abutting on the Belleville Turnpike conveyed to the Mayor and Common Council of Jersey City by John H. Coster and others, by deed dated June 16, 1853 and recorded in Deed Book 33, page 261, in the office of the Register of Hudson County.

B. Such facts as the aforesaid survey may disclose.

C. Restrictions of record.

D. Rights of Tanatex Chemical Corp., by sundry leases.

E. Easement for ditch as contained and described in Deed Book 33 page 261.

F. Rights in railroad siding.

G. Rights, if any, of the State of New Jersey, if the premises described were ever flowed by tide water.

H. Rights in poles and wires on lands above described.

I. Municipal and zoning ordinances.

J. Rights in ditch on described premises.

RECEIVED
OCT 19 9 31 AM '62
HUDSON COUNTY
REGISTER

Together with all and singular the houses, buildings, trees, ways, waters, profits, privileges, and advantages, with the appurtenances to the same belonging or in anywise appertaining:

Also, all the estate, right, title, interest, property, claim and demand whatsoever, of the said party of the first part, of, in and to the same, and of, in and to every part and parcel thereof,

To have and to hold all and singular the above described land and premises, with the appurtenances, unto the said party of the second part, its SUCCESSORS and assigns, to the only proper use, benefit and behoof of the said party of the second part, its successors ~~him~~, and assigns forever:

And the said party of the first part,

for itself, its successors and / ^{assigns} ~~himself~~ does covenant, promise and agree to and with the said party of the second part, its successors and assigns that it has not made, done, committed, executed or suffered any act or acts, thing or things whatsoever, whereby or by means whereof the above mentioned and described premises, or any part or parcel thereof, now are, or at any time hereafter shall or may be impeached, charged or encumbered, in any manner or way whatsoever.

In Witness Whereof, the party of the first part has ~~himself~~ caused these presents to be signed by its proper corporate officers and caused its proper corporate seal to be hereunto affixed, the day and year first above written.

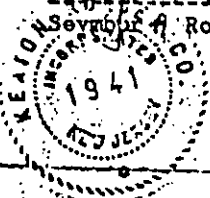
~~Signature of Secretary~~
(Corporate Seal)

KEATON RUBBER CO.

ATTEST:

~~Signature of Secretary~~
Secretary A. Rogow, Secretary

by ~~Signature of President~~
MICHAEL ROGOW President



1002913 nml1006

State of New Jersey, } ss:
County of ESSEX

Be it Remembered, that on this 17th day of October
In the year One Thousand Nine Hundred and Sixty-Two
personally appeared Seymour A. Rogow
SEYMOUR A. ROGOW,

who, being by me duly sworn on his oath, doth depose and make proof to my satisfaction, that he
is the secretary of KEATON RUBBER CO.,

the grantor named in the within instrument; that MICHAEL ROGOW
is the President of said corporation; that the execution, as well as the making
of this Instrument, has been duly authorized by a proper resolution of the board of directors of said
corporation; that deponent well knows the corporate seal of said corporation; and the seal affixed to
said Instrument is such corporate seal and was thereto affixed and said Instrument signed and delivered
by said President, as and for his voluntary act and deed and as and for the voluntary
act and deed of said corporation, in presence of deponent, who thereupon subscribed his name thereto
as witness.

Sworn and subscribed before me,
at KERNY N.J.
the date aforesaid

Seymour A. Rogow
SEYMOUR A. ROGOW, Secretary

Martin Simon
MARTIN SIMON
Attorney at Law

5717
519 786 50061515
519 786 50061515

DEED

KEATON RUBBER CO.,
N.J. corporation

TO 1435
STANDARD CHLORINE CHEMICAL
CO., INC., a N.J. corporation

Dated, October 17th, 1962

Recorded in the Office of
the County of N. J.,
on the day of , 19
at o'clock, in the noon and
Recorded in Book of DEEDS for
said County, on page

153-731
NEW JERSEY REALTY TITLE
INSURANCE COMPANY
830 BROAD STREET
NEWARK 1, N. J.

State of New Jersey, } ss:
County of

Be it Remembered, that on this day of
In the year One Thousand Nine Hundred and
personally appeared

who, I am satisfied, the grantor mentioned in the within Instrument, to
whom I first made known the contents thereof, and thereupon acknowledged that
signed, sealed and delivered the same as voluntary act and deed, for the uses and
purposes therein expressed.

Erie-Lackawanna Railroad Company



Kearny Op.
Site: Eor...
(R.R.)

J. R. EBERT
SUPERINTENDENT

April 19, 1963
File 349.1

ERIE-LACKAWANNA TERMINAL
HOBOKEN, N. J.

JK
Standard Chlorine Chemical Company, Inc.
Jacobus Avenue
South Kearny, N. J.

✓ Attn. Mr. H. Everett Smith
Executive Vice President

Keaton Rubber Co.
Belleville Turnpike
Kearny, N. J.

Attn. Mr. M. Rogow, President

Gentlemen:

Herewith for each of your records, fully-executed duplicate original of assignment-consent dated December 11, 1962 whereby the rights and interest of Keaton Rubber Co. under agreement of July 23, 1957, with Erie R. R. Co. covering sidetrack 829 feet long and tripartite agreement of same date by which service was extended to Tanstex Chemical Corp. were transferred to Standard Chlorine Chemical Company, Inc.

Will you kindly acknowledge receipt?

Yours very truly,

RECEIVED
APR 22 1963


J. R. Ebert *apm*
Superintendent

The Friendly Service Route

KNOW ALL MEN BY THESE PRESENTS, that WHEREAS, ERIE RAILROAD COMPANY and KEATON RUBBER CO., entered into an agreement dated July 23rd, 1957, covering the ownership, operation, maintenance and use of a sidetrack 829 feet long, situated in the Town of Kearny, County of Hudson, State of New Jersey; and

WHEREAS, by another agreement dated July 23rd, 1957 made between ERIE RAILROAD COMPANY, KEATON RUBBER CO. and TANATEX CHEMICAL CORPORATION, the latter was given the right to use and to be served by said sidetrack; and

WHEREAS, ERIE-LACKAWANNA RAILROAD COMPANY has succeeded to the interest of ERIE RAILROAD COMPANY under said agreements.

NOW, THEREFORE, in consideration of the covenants herein contained and of One Dollar (\$1.00) paid by STANDARD CHLORINE CHEMICAL CO., INC. to said KEATON RUBBER CO. the receipt whereof is hereby acknowledged, the said KEATON RUBBER CO. does hereby transfer and assign unto the said STANDARD CHLORINE CHEMICAL CO., INC. a corporation of the State of New Jersey, with principal office at 115 Jacobus Avenue, Kearny, N. J., its successors and assigns, all the right, title and interest of said KEATON RUBBER CO. in, to and under the said agreements dated July 23rd, 1957, and in and to the sidetrack described in the first aforementioned agreement and in consideration of this assignment and of the annexed consent of ERIE-LACKAWANNA RAILROAD COMPANY said STANDARD CHLORINE CHEMICAL CO., INC. hereby assumes all of the covenants, provisions and conditions of said agreements as fully and to the same extent as if it had been originally named the Industry therein in place and stead of said KEATON RUBBER CO. and agrees to be bound by and to perform, fulfill and carry out all of the covenants, provisions and conditions to be performed, fulfilled and carried out by the Industry under said agreements.

IN WITNESS WHEREOF, the parties hereto have caused these presents to be executed by their proper officers on the 11th day of December, 1962.

Witness:

Raymond Rogers

KEATON RUBBER CO.

By *Michael Rogers*
President

Witness:

H. Smith

STANDARD CHLORINE CHEMICAL CO., INC.

By *William K. Kuntz*
President

ERIE-LACKAWANNA RAILROAD COMPANY, hereby consents to the foregoing assignment from KEATON RUBBER CO. to STANDARD CHLORINE CHEMICAL CO., INC. of the above described agreements dated July 23rd, 1957, and in consideration of such consent, the said STANDARD CHLORINE CHEMICAL CO., INC. hereby assumes all of the covenants, provisions and conditions of said agreements as fully and to the same extent as if it had been originally named the Industry in said agreements in place and stead of said KEATON RUBBER CO. and agrees to be bound by and to perform fulfill and carry out all of the covenants and provisions undertaken or to be performed by the Industry under said agreements.

It is understood and agreed that said KEATON RUBBER CO. is released of any obligation or responsibility under said agreements dated July 23rd, 1957 from and after December 10, 1962.

IN WITNESS WHEREOF, the parties hereto have caused this instrument to be executed by their proper officers this 11th day of December, 1962.

9Rt
Witness:

L.H. McKee

ERIE-LACKAWANNA RAILROAD COMPANY

By L.C. White
Vice President

Witness:

H. Hunt

STANDARD CHLORINE CHEMICAL CO., INC.

By Graham Hunt
President

Articles of Agreement,

made the 14th

day of September in the year One Thousand Nine Hundred and Sixty-Two

BETWEEN KEATON RUBBER CO., a New Jersey corporation,

~~existing~~

in the Town of Kearny in the County of
Hudson and State of New Jersey, hereinafter referred to as the Seller;

AND STANDARD CHLORINE CHEMICAL CO., INC., a New Jersey corporation,
having its principal place of business at 115 Jacobus Avenue,

in the Town of Kearny, in the County of
Hudson and State of New Jersey, hereinafter referred to as the Purchaser;

WITNESSETH, That the Seller, for and in consideration of the sum of Three Hundred Thirty-Five Thousand (\$335,000.00) Dollars

to be paid and satisfied as hereinafter mentioned, and also in consideration of the covenants and agreements hereinafter mentioned, made and entered into by the Purchaser, doth agree to and with the said Purchaser, that the Seller will well and sufficiently convey to the said Purchaser by Deed of Bargain & Sale with covenants against grantor free from all encumbrance except as hereinafter mentioned, on or before the 14th day of October, next ensuing the date hereof,

ALL those certain lot s, tract s, or parcel s of land and premises together with the buildings thereon and the appurtenances thereto appertaining, hereinafter particularly described, situate, lying and being in the Town of Kearny in the County of Hudson and State of New Jersey.

FIRST PARCEL:

BEGINNING at a point formed by intersecting the northeasterly property line of lands lying on the northeasterly side of Belleville Turnpike with the southerly boundary of land conveyed to The White Tar Co., of N.J., Inc., by deed dated October 4, 1916, recorded in Deed Book 1238, page 408, in the Register's Office of Hudson County, N.J.; running thence (1) along said boundary line N. 58° 22' 30" E. 32.77'; thence (2) still along the same parallel with the center line of lands of the Pennsylvania Railroad Company and distant 870 feet southerly therefrom, N. 74° 15' E. 1039.47' to the northwesterly corner of lands conveyed to the Koppers Co., Inc., by Thomas A. Edison, Incorporated by deed dated November 18, 1946; thence (3) along the westerly line of land so conveyed, S. 15° 45' E. 400' to the southerly line of land conveyed to Thomas A. Edison by James H. Rhodes and Co., by deed dated July 29, 1918 and recorded in Deed Book 1288 on page 299 in the office of the Register of Hudson County; thence (4) along the same parallel with the second described course, S. 74° 15' W. 638.19' to the northerly side line of the Old Newark Branch of the Erie Railroad; thence (5) along the same N. 71° 48' W. 479.95' to the northeasterly property line of lands lying on the northeasterly side of Belleville Turnpike; and running thence; (6) along the said property line N. 31° 37' 30" W., 127.91' to the place and point of BEGINNING.

SECOND PARCEL:

BEGINNING at a point formed by intersecting the northeasterly property line of lands lying on the northeasterly side of Belleville Turnpike with the southerly boundary line of land conveyed to Thomas A. Edison by James H. Rhodes and Co., by deed dated July 29, 1918, and recorded in Book 1288 of Deeds on page 299 in the office of the Register of Hudson County; running thence (1) along said southerly boundary line, N. 74° 15' E., 203.72' to a point in the southerly side line of the Old Newark Branch of the Erie Railroad; thence (2) along the same, N. 71° 48' W. 303.77' to the northeasterly property line of lands lying on the northeasterly side of Belleville Turnpike; and running thence (3) along said line S. 31° 37' 30" E. 176.37' to the point and place of BEGINNING.

The foregoing premises constitute all the premises owned by Seller in Kearny.

The foregoing descriptions being in accordance with a survey made by Borrie & McDonald, Surveyors, December 16, 1961.

The foregoing lands and premises are to be conveyed expressly subject to the following:

A. The estate and rights in and about a strip abutting on the Belleville Turnpike conveyed to the Mayor and Common Council of Jersey City by John H. Coster and others, by deed dated June 16, 1853 and recorded in Deed Book 33, page 261, in the office of the Register of Hudson County.

B. Such facts as the aforesaid survey may disclose.

C. Restrictions of record provided they do not render the title unmarketable.

D. To rights of Tanatex Chemical Corp., by sundry leases.

E. To easement for ditch as contained and described in Deed Book 33 page 261.

F. To rights in railroad siding.

G. To rights, if any, of the State of New Jersey, if the premises described were ever flowed by tide water.

H. To rights in poles and wires on lands above described.

I. To municipal and zoning ordinances and restrictions of record, provided that the same do not interfere with the use of the premises

J. To rights in ditch on described premises. by purchaser in the operation of its business.

The foregoing premises are the same premises conveyed to Keaton Rubber Co., by Crown Rubber Products, Inc., a New Jersey corporation, by deed dated September 1, 1959, recorded in the Register's Office of Hudson County in Book 2822 of deeds for said county on page 140.

AND the Purchaser covenants, promises and agrees to and with the Seller that the Purchaser will pay and satisfy, or cause to be paid and satisfied, unto the Seller, the said sum aforesaid as and for the purchase money of the foregoing described land and premises, in the following manner, that is to say:

On execution of this agreement for which this is also a receipt

\$33,500.00

On delivery of deed, cash

301,500.00 *

\$335,000.00

*less the sum of \$5,000 referred to in the attached rider.

SEE RIDER ATTACHED HERETO AND MADE A PART HEREOF

This contract is entered into upon the knowledge of the parties as to the value of the land and whatever buildings are upon the same, and not on any representations made as to character or quality.

RIDER TO
CONTRACT OF SALE

Between KEATON RUBBER CO., a New Jersey Corporation, as Seller, and STANDARD CHLORINE CHEMICAL CO., INC., a New Jersey Corporation, as Purchaser, dated September 14, 1962.

1. Upon execution and delivery of the within agreement, the Purchaser is expressly granted:

(a) Permission to enter upon the lands and premises and remove therefrom the Cyclone fence running along the second course of the description of the First Parcel and to dispose of the same in such manner as it sees fit.

(b) To construct or re-construct, in such manner as it sees fit, any and all roads or access to, from or in and about the premises described herein.

(c) Permission to enter upon the areas described as 2 "Tank Farm" and 3 "Cooling Tower" on the map attached hereto and made a part hereof, and therein and thereon to perform such construction, re-construction or alteration work as it may require for its purposes and at its own cost and expense.

(d) Not later than 2 weeks from the date hereof, the Seller will permit the Purchaser to come into the area designated on the attached map as 1 "Molding Units", and therein and thereon to perform such construction, reconstruction or alteration work as it may require for its purposes and at its own cost and expense.

Not later than 4 weeks from the date hereof, the Seller will permit the Purchaser to come into the area designated on the attached map as 4 "Crystalizers", and therein and thereon to perform such construction, re-construction or alteration work as it may require for its purposes and at its own cost and expense.

In the event that the title agreed to be conveyed is not marketable and insurable, the Seller will indemnify the Purchaser to the extent of the expenditures made by it in connection with all of the foregoing permissive uses in this paragraph "1", except, however, that no right to such indemnification shall arise in the event of a default by the Purchaser.

2. The Purchaser shall promptly cause an examination to be made of the title which is the subject of this contract and promptly upon the receipt by the Purchaser of the title examination report, if the title described herein is not marketable and insurable, prompt notice shall be given by the Purchaser to the Seller and all work by it shall promptly cease and come to an end and any demand for indemnification shall be made based on such work as it may have done on the premises to such time. Such notice shall be given by Registered Mail, Return Receipt Requested, addressed to the Seller c/o Martin Simon, Esq., 60 Park Place, Newark, N. J. and in no case shall such notice be sent later than October 14, 1962.

WES

Any rights of the Purchaser to indemnification under paragraph "1" shall cease and come to an end upon the transfer of title pursuant to the within contract.

3. The Seller is hereby given permission to remain in possession of the premises now occupied by it for a period not later than December 10, 1962 and shall be required to pay to the Purchaser a rental of One (\$1.00) Dollar per month for the period from October 14, 1962 to December 10, 1962. In addition to such rental, the Seller shall be required to pay all taxes, insurance and all other carrying charges and expenses of and for the premises hereby conveyed and in connection with the management and operation of the said property, and the Seller shall be entitled to receive, during such period, the rent from the Tenant. In the event that the Seller shall not have vacated the premises on or before December 10, 1962:

(a) The Seller shall thereafter pay to the Purchaser, for the premises now occupied by it, a rental of Five Thousand (\$5,000.00) Dollars per month.

(b) In addition to said rental, the Seller shall be required to pay all taxes, insurance and all other carrying charges and expenses of and for said premises hereby conveyed and in connection with the management and operation of the said property, from and after December 10, 1962 to the date on which it vacates said premises.

(c) The Purchaser shall be entitled to receive and retain the rent from the Tenant, from and after December 10, 1962.

(d) The Purchaser shall have the right, at any time, to summarily evict the Seller and to damages.

(e) All remedies of Purchaser shall be cumulative.

4. Anything to the contrary notwithstanding, the Seller shall before closing, satisfy any and all mortgages on said premises.

5. On December 10, 1962, or in the event that the Seller vacates the premises prior thereto, then, on the date of such vacating of the premises, adjustment shall be made between the parties for taxes, insurance, water rents and the rents collected or due from the Tenant, Tanatex Chemical Corp., and, at the same time, the Seller will turn over to the Purchaser, the advance rental paid by Tanatex on its lease #3 for the period from December 10, 1962 or the date of such vacating to February 14, 1964, which rental was prepaid at the rate of \$175.00 per month, and in addition thereto, the Seller will turn over to the Purchaser, the sum of \$3,800.00 deposited by Tanatex as security for the performance of leases #1 and #2. In addition thereto, the

Seller will turn over to the Purchaser the sum of \$1,000.00 as a concession and in full and final discharge of any claim which the Purchaser may have as against the Seller relating to rights of the Purchaser with regard to removal of any property from the demised premises by the tenant; and said sum of \$1,000.00 shall be retained by the Purchaser whether or not it has or asserts any such claim against the Seller, or any claim against the tenant as described in the paragraph below.

Anything to the contrary notwithstanding, the Purchaser shall make payment to the Seller of \$296,500.00 upon delivery of the deed and shall retain the remaining \$5,000.00 of the purchase price pending the vacating of the premises by the Seller and the adjustments then to be made as aforesaid.

Nothing herein contained shall limit or abridge the right of the Purchaser to prosecute any claim which it may have against the tenant, Tanatex, in the event that said tenant removes from the demised premises any property which, under the terms of the leases between the Seller and the said tenant, could be claimed by the Seller to be or to have become the property of the landlord, and the Purchaser shall have all of the rights against said tenant afforded to the lessor under said leases.

W.C.K.
Jr.

AND the said Seller hereby agrees to pay to J.I. Kislak, Inc., a commission ~~of~~ ~~the purchase price of the said~~ said commission to be paid in consideration of services rendered in consummating this sale; said commission to become due and payable upon the execution of the deed, delivery of same and payment in full of the consideration required to be paid hereunder.

AND IT IS FURTHER AGREED, by the parties to these presents, that the Purchaser may enter into and upon the said land and premises ~~as~~ as provided ~~herein~~ ~~next ensuing~~ the date hereof, and from thence take the rents, issues and profits to the use of the Purchaser.

AND IT IS FURTHER AGREED, by the parties hereto, that the said Deed Bargain & Sale with/ shall be delivered and received, and payments made at the office of Martin Simon, Esq., 60 Park Place, Newark, N. J.,

between the hours of 10:00 o'clock in the fore noon and 4:00 o'clock in the after-noon on the said day of closing ~~Monday, November 2, 1931~~

It is expressly understood and agreed that the title to the land and premises hereby agreed to be conveyed is not derived from any proceedings or any Act for the Sale of Land for the non-payment of municipal taxes or assessments, or adverse or color of title possession.

It is further expressly agreed that words used in the singular shall include words in the plural where the text of this instrument so requires.

AND for the performance of all and singular the covenants and agreements aforesaid, the said parties do bind themselves and their respective heirs, executors, administrators, successors and assigns; ~~and each of them~~ ~~and each of them~~

IN WITNESS WHEREOF, the said parties have hereunto interchangeably set their hands and seals, or caused these presents to be signed by their proper corporate officers and caused their proper corporate seals to be hereunto affixed, the day and year first above written.

~~Witness my hand and seal this~~
~~day of~~

ATTEST:

Signature
Secretary

Signature
Assistant Secretary

KEATON RUBBER CO.

By Michael Regan President

STANDARD CHLORINE CHEMICAL CO. INC.

By Signature Exec. Vice President

L. S.

In consideration of mutual promises and agreements herein stated, we hereby agree to extend the date for the delivery of deed and execution of this contract to at same hour and place.

WITNESS our hands and seals this day of

19

BE IT REMEMBERED, That on this
in the year One Thousand Nine Hundred and
personally appeared

day of

before me, the subscriber,

who, I am satisfied,
acknowledged that,
act and deed, for the uses and purposes therein expressed.

mentioned in the within Instrument, and thereupon

signed, sealed and delivered the same as

STATE OF NEW JERSEY, COUNTY OF

ss.:

BE IT REMEMBERED, That on this
in the year One Thousand Nine Hundred and

day of

before me, the subscriber,

personally appeared
who, being by me duly sworn on oath, doth depose and make proof to my satisfaction, that he
is the

the
is the
of this Instrument has been duly authorized by a proper resolution of the Board of
of said corporation; that deponent well knows the corporate seal of said corporation; and the seal affixed
to said Instrument is such corporate seal and was thereto affixed and said Instrument signed and delivered
by said
voluntary act and deed of said corporation, in presence of deponent, who thereupon subscribed h
thereto as witness.

Subscribed and sworn to before me,
at
the date aforesaid

Contract

for Sale of Property

KEATON RUBBER CO., a N.J. Corp.

TO

STANDARD CHLORINE CHEMICAL
CO., INC., a N.J. Corp.

Dated, September 10 1962

LAW OFFICES
MARTIN SIMON
60 Park Place
Newark 2, N.J.

The observance of the following suggestions will save time and trouble at the closing of this Title.

THE SELLER

FIRST: Should bring with him all insurance policies and duplicates.

SECOND: He should also bring the tax and water receipts of the current year, and any leases, deeds and agreements relating to the premises.

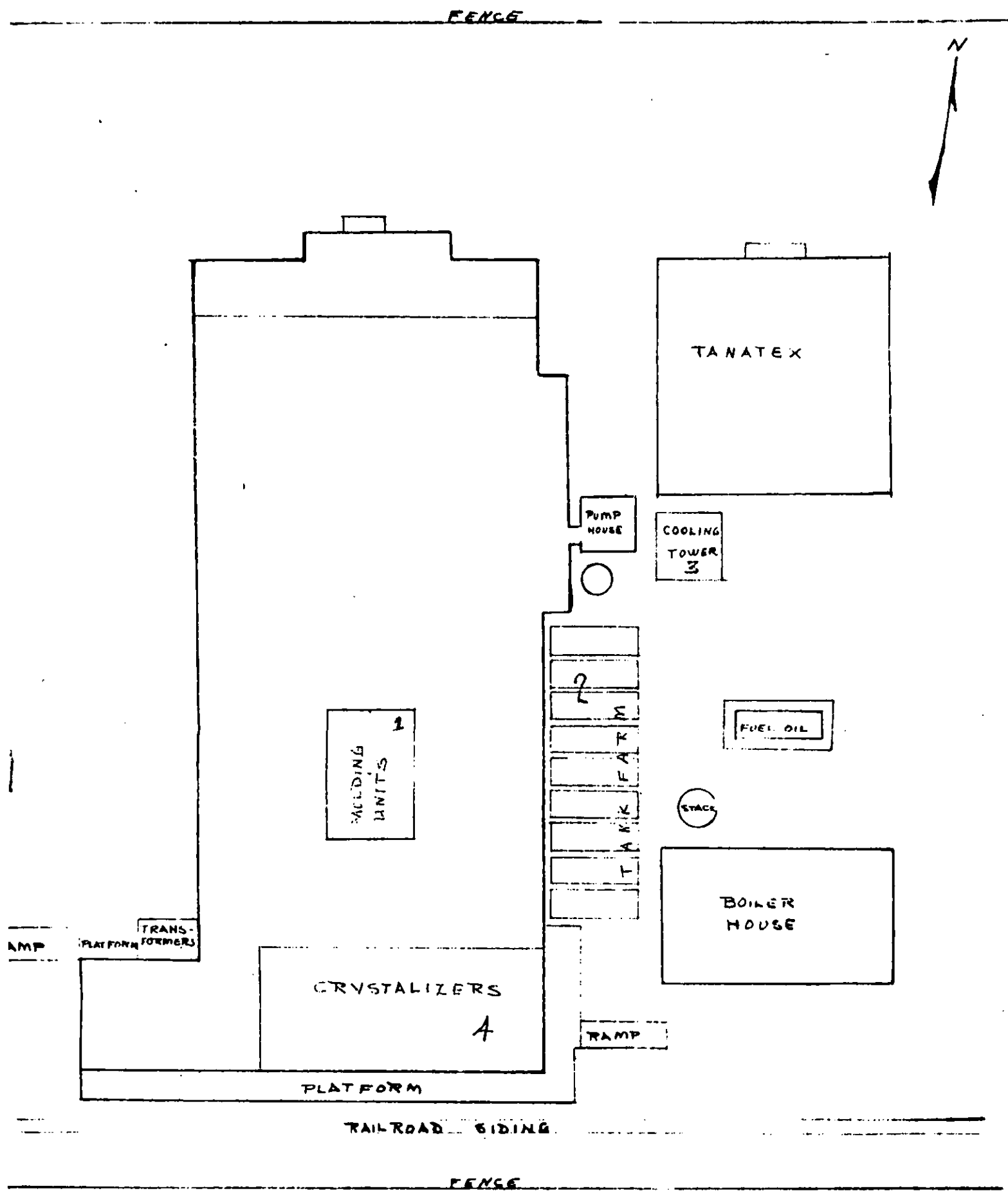
THIRD: If there are mortgages on the premises to be conveyed, the seller should produce receipts showing to what date the interest has been paid, and if the principal has been reduced, evidence of such reduction, in form to be recorded, must be produced and recorded.

FOURTH: If the grantor is a married man, his wife must join in the execution of the deed.

FIFTH: The seller should furnish to the purchaser a full list of tenants, giving the names, rent paid by each, and date to which rent has been paid.

THE PURCHASER

Should be prepared with money or a certified check drawn to his own order. The certified check may be for an approximate amount and money may be provided for the balance of the settlement.



EDISON PLANT
BELLEVILLE T'PIKE

SCALE: 1" = 30'-0" 6/27/58